

Exhibit 1

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

DECLARATION OF ROMAN P. STORZER

DECLARATION OF ROMAN P. STORZER

Roman P. Storzer declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am the supervising attorney and sole shareholder of Storzer & Associates, P.C., at 1025 Connecticut Ave. NW, Suite 1000, Washington, DC 20036, attorneys for the Plaintiffs, and make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendant.
2. This Declaration is based on my own personal knowledge.
3. I am a duly licensed attorney at law and a member in good standing of the bars of the following courts:

Court	Admission Date
United States Supreme Court	5/2/2000
Second Circuit Court of Appeals	4/20/2005

Third Circuit Court of Appeals	6/7/2002
Fourth Circuit Court of Appeals	11/14/2011
Sixth Circuit Court of Appeals	10/18/2000
Seventh Circuit Court of Appeals	6/21/2002
Ninth Circuit Court of Appeals	5/29/2002
Tenth Circuit Court of Appeals	9/12/2002
Eleventh Circuit Court of Appeals	6/27/2019
United States District Court for the Western District of Michigan	3/22/2000
United States District Court for the Northern District of Illinois	7/22/2003
United States District Court for the District of Maryland	3/23/2007
United States District Court for the District of Columbia	5/5/2003
State of Maryland Courts	12/19/1996
District of Columbia Courts	11/27/1998

4. I graduated with honors from the George Washington University Law School in 1996.
5. I have significant experience with respect to litigating religious freedom cases. I was the Director of Litigation for the nonprofit organization The Becket Fund for Religious Liberty, and supervised several attorneys in religious rights litigation, after which I have represented many religious organizations in such matters in private practice since 2004. I have co-authored law review articles on RLUIPA issues titled

- “Christian Parking, Hindu Parking: Applying Established Civil Rights Principles to RLUIPA's Nondiscrimination Provision,” Richmond J. of L. & Pub. Interest (2013), and “The Religious Land Use and Institutionalized Persons Act Of 2000: A Constitutional Response to Unconstitutional Zoning Practices,” George Mason L. Rev. (2001).
6. My cases at Storzer & Associates, P.C. include litigation arising out of the First and Fourteenth Amendments to the United States Constitution, the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. § 2000cc, *et seq.*, and the Fair Housing Act, 42 U.S.C. § 3601, *et seq.*
 7. I have obtained relief, or advocated, for my clients under the constitution and those statutes in the following representative cases: *Congregation Rabbinical College of Tartikov, Inc. v. Village of Pomona, NY*, 945 F.3d 83 (2d Cir. 2019); *Jesus Christ Is The Answer v. Baltimore Cnty.*, Md, 915 F.3d 256 (4th Cir. 2019); *Bethel World Outreach v. Montgomery Cnty.*, 706 F.3d 548 (4th Cir. 2013); *Thai Meditation Ass'n of Alabama, Inc. v. City of Mobile, Alabama*, 980 F.3d 821 (11th Cir. 2020); *Hunt Valley Baptist Church, Inc. v. Baltimore Cnty., Maryland*, No. CV SAG-17-0804, 2020 WL 618662 (D. Md. Feb. 10, 2020); *Bensalem Masjid, Inc. v. Bensalem Twp., Pennsylvania*, No. CV 14-6955, 2022 WL 1488439 (E.D. Pa. May 11, 2022); and *Omar Islamic Ctr. Inc. v. City of Meriden*, No. 3:19-CV-00488 (SVN), 2022 WL 4599150 (D. Conn. Sept. 30, 2022).
 8. I have worked on this litigation since its inception with respect to all aspects of the same.

9. My services in this litigation were billed at \$500.00 per hour.
10. Throughout the course of this litigation I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of those records of the work performed on this matter as well as my exercise of billing judgment to write off any time entries that may be seen as unproductive, excessive, or redundant. It reflects 80.47 hours of billable attorney time I spent on this matter.
11. As managing attorney for this appeal, I reviewed the billing records attached to the Declarations of the following attorneys:
 - i. Eric W. Treene
 - ii. Sieglinde K. Rath
 - iii. Samuel L. Speed
 - iv. Jonathan S. Gross
12. In consultation with those attorneys, I exercised my billing judgment to write off any time entries that may be seen as unproductive, excessive, or redundant.
13. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**.
14. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this matter for the period as indicated thereon.
15. As the managing attorney for this litigation, I directed and supervised the work and billing of the paralegals involved in this matter. They are: Bailey Nick, Steven Silvia, and Gina DeFrancisci. Their services were billed at \$125.00 per hour.

16. Per my instruction, throughout the course of this litigation the paralegals listed above maintained contemporaneous time records of their services rendered on behalf of Plaintiffs. **Exhibit B** contains a listing of those records of work performed in this matter as well as my exercise of billing judgment to write off any time entries that may be seen as unproductive, excessive, or redundant. It reflects a total of 85.49 hours of billable paralegal time spent on these appeals and Plaintiffs' application for attorney's fees as follows:

Bailey Nick	25.64
Steven Silvia	29.43
Gina DeFrancisci	30.42

17. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit B**. I certify the records displayed in **Exhibit B** to be accurate and true and that they were incurred with respect to providing paralegal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023



Roman P. Storzer

DECLARATION OF ROMAN P. STORZER
EXHIBIT A

Timekeeper:	Roman P. Storzer	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
8/3/2021	RPS	Phone call from client	Phone call with client & JSG re:[REDACTED]	0.32	\$500.00	\$160.00
8/5/2021	RPS	Correspondence	Review various email correspondence re: media; criminal case, inspection; call w/JSG re: upcoming issues	0.98	\$500.00	\$490.00
8/9/2021	RPS	Phone other	Phone call w/D. Markowitz re:	0.22	\$500.00	\$110.00
8/10/2021	RPS	Phone call from client	Phone conference w/client & co-counsel & JSG re: [REDACTED]	0.53	\$500.00	\$265.00
8/15/2021	RPS	Research	Research [REDACTED] for federal complaint	0.80	\$500.00	\$400.00
8/16/2021	RPS	Correspondence	Review emails concerning SUP application; planner retention	0.33	\$500.00	\$165.00
8/20/2021	RPS	Phone other	Phone conference w/potential expert witness (planner)	0.18	\$500.00	\$90.00
8/20/2021	RPS	Phone call from client	Phone call with client re: [REDACTED]	0.39	\$500.00	\$195.00
8/22/2021	RPS	Draft Documents	Draft federal complaint	0.77	\$500.00	\$385.00
9/9/2021	RPS	Phone other	Phone conference w/client & co-counsel re: [REDACTED]	0.62	\$500.00	\$310.00
9/14/2021	RPS	Phone other	Phone calls w/planner, JSG re: federal complaint [REDACTED]; emails re: same; review of findings re: same	1.00	\$500.00	\$500.00
9/26/2021	RPS	Phone other	Phone call w/SKR re: [REDACTED]	0.17	\$500.00	\$85.00
9/26/2021	RPS	Phone call from client	Phone call with client about [REDACTED]	0.08	\$500.00	\$40.00
9/26/2021	RPS	Draft Documents	Draft federal complaint	4.88	\$500.00	\$2,440.00
9/27/2021	RPS	Draft Documents	Draft federal complaint	1.21	\$500.00	\$605.00
10/6/2021	RPS	Draft Documents	Research for federal complaint; email correspondence re: same; call w/J. Slagter re: same	0.90	\$500.00	\$450.00
10/7/2021	RPS	Legal Research	Legal research re: federal complaint; call w/JGS re: same	0.80	\$500.00	\$400.00

10/8/2021	RPS	Draft Documents	Draft federal complaint; review Slagter complaint edits; call w/client re: [REDACTED]	0.79	\$500.00	\$395.00
10/10/2021	RPS	Draft Documents	Draft federal complaint; email correspondence re: same; review media articles re: same	4.06	\$500.00	\$2,030.00
10/11/2021	RPS	Preparation of pleadings	Finalizing documents (PHV motions, complaint, disclosures); email correspondence re: same	1.50	\$500.00	\$750.00
10/12/2021	RPS	Draft Documents	Draft media release; call w/client re: [REDACTED]; finalize PHV papers	0.76	\$500.00	\$380.00
10/12/2021	RPS	Meeting	Meeting w/JGS, SKR re: [REDACTED]	0.10	\$500.00	\$50.00
10/13/2021	RPS	Preparation of pleading	Final review of complaint & supporting documents; email correspondence re: same; media release re: same	0.50	\$500.00	\$250.00
10/14/2021	RPS	Correspondence	Email correspondence w/media re: lawsuit, & co-counsel re: [REDACTED]	0.40	\$500.00	\$200.00
10/17/2021	RPS	Correspondence	Email correspondence re: federal complaint; review of media reports re: same	0.36	\$500.00	\$180.00
10/21/2021	RPS	Phone other	Phone conference w/J. Slagter, JSG, SKR re: [REDACTED]	0.44	\$500.00	\$220.00
10/22/2021	RPS	Correspondence	Email correspondence w/client re: [REDACTED]	0.28	\$500.00	\$140.00
10/29/2021	RPS	Draft Documents	Draft mediation memorandum; email correspondence w/JSG/SKR/EWT re: [REDACTED]	0.51	\$500.00	\$255.00
10/30/2021	RPS	Correspondence	Email correspondence re:	0.40	\$500.00	\$200.00
11/5/2021	RPS	Correspondence	Email correspondence re: potential mediation	0.25	\$500.00	\$125.00
11/8/2021	RPS	Phone other	Phone call w/JSG re: [REDACTED]; email correspondence re: same	0.50	\$500.00	\$250.00
11/11/2021	RPS	Meeting	Meeting w/JSG re: [REDACTED]; email correspondence re: same	0.24	\$500.00	\$120.00
11/13/2021	RPS	Correspondence	Various email correspondence re: stay, mediation	0.45	\$500.00	\$225.00
11/19/2021	RPS	Correspondence	Email correspondence re: mediation; mediation statement	0.50	\$500.00	\$250.00

11/21/2021	RPS	Draft Documents	Draft mediation statement & email correspondence re: same	0.47	\$500.00	\$235.00
11/22/2021	RPS	Court Appearance for H	hearing; hearing; meeting with co-counsel & clients re: same; travel to/from same (billed at 1/2-time)	8.00	\$500.00	\$4,000.00
11/23/2021	RPS	Meeting	Phone conference w/mediator re: mediation	0.58	\$500.00	\$290.00
11/23/2021	RPS	Travel	Return travel from Ohio for hearing (billed at 1/2-time)	2.50	\$500.00	\$1,250.00
11/26/2021	RPS	Draft Documents	Draft mediation statement	1.00	\$500.00	\$500.00
11/27/2021	RPS	Correspondence	Email correspondence re: settlement issues	0.22	\$500.00	\$110.00
12/2/2021	RPS	Travel	Travel for mediation (billed at 1/2-time)	3.00	\$500.00	\$1,500.00
12/3/2021	RPS	Meeting	Mediation in Ohio	7.50	\$500.00	\$3,750.00
12/4/2021	RPS	Travel	Return trip from Ohio (billed at 1/2-time)	2.75	\$500.00	\$1,375.00
12/10/2021	RPS	Correspondence	Various email correspondence re: settlement/mediation; preparation for call next week	1.06	\$500.00	\$530.00
12/15/2021	RPS	Phone other	Phone call w/mediator re: settlement; email correspondence w/JSG re: same; research on [REDACTED]	0.75	\$500.00	\$375.00
12/19/2021	RPS	Draft Documents	Draft mediation submission; email correspondence re: same	0.21	\$500.00	\$105.00
12/27/2021	RPS	Draft Documents	Draft mediation supplement	0.20	\$500.00	\$100.00
12/28/2021	RPS	Draft Documents	Draft mediation statement	0.77	\$500.00	\$385.00
12/29/2021	RPS	Correspondence	Email correspondence w/co-counsel, JSG re: [REDACTED]	0.51	\$500.00	\$255.00
1/23/2022	RPS	Correspondence	Email correspondence re: mediation	0.49	\$500.00	\$245.00
2/13/2022	RPS	Correspondence	Email correspondence re: mediation, other issues	0.48	\$500.00	\$240.00
2/14/2022	RPS	Phone other	Phone conference w/mediator, J. Slagter, JGS; email correspondence re: same and status update	0.42	\$500.00	\$210.00
2/14/2022	RPS	Phone call from client	Phone call updating client re: [REDACTED]	0.16	\$500.00	\$80.00
2/21/2022	RPS	Correspondence	Email correspondence re: mediation	0.13	\$500.00	\$65.00

2/23/2022	RPS	Correspondence	Email correspondence re: settlement issues	0.25	\$500.00	\$125.00
3/3/2022	RPS	Phone call from client	Phone call with client, J. Slagter, JSG re: [REDACTED]; email correspondence re: same	0.38	\$500.00	\$190.00
3/8/2022	RPS	Phone call from client	Phone call from client re: [REDACTED]	0.15	\$500.00	\$75.00
3/17/2022	RPS	Meeting	Meeting w/SKR re: [REDACTED]	0.10	\$500.00	\$50.00
3/23/2022	RPS	Correspondence	Email correspondence re: scheduling & settlement; call w/SKR re: same	0.25	\$500.00	\$125.00
3/27/2022	RPS	Correspondence	Email correspondence re: settlement, scheduling	0.51	\$500.00	\$255.00
3/28/2022	RPS	Phone other	Phone call and email correspondence re: MTD	0.25	\$500.00	\$125.00
3/30/2022	RPS	Correspondence	Email correspondence re: settlement, restarting litigation, MTD opposition	0.40	\$500.00	\$200.00
4/15/2022	RPS	Meeting	Meeting w/JSG, EWT, SKR re: [REDACTED]; review order for same	0.30	\$500.00	\$150.00
4/18/2022	RPS	Correspondence	Email correspondence re: status conference	0.46	\$500.00	\$230.00
4/18/2022	RPS	Correspondence	Email correspondence re: scheduling order, next steps	0.47	\$500.00	\$235.00
4/26/2022	RPS	Meeting	Meeting w/JSG, SKR re: [REDACTED]	0.17	\$500.00	\$85.00
5/2/2022	RPS	Meeting	Meeting w/EWT & SKR re: [REDACTED]; email correspondence re: same	0.11	\$500.00	\$55.00
5/3/2022	RPS	Meeting	Meeting with client re: [REDACTED]; travel to/from same (billed at 1/2-time); email correspondence & calls w/JSG re: same; review of orders re: same	2.88	\$500.00	\$1,440.00
5/4/2022	RPS	Correspondence	Email correspondence re: Rule 16 conference	0.22	\$500.00	\$110.00
5/4/2022	RPS	Review	Review Rule 26(f) Report draft	0.64	\$500.00	\$320.00
5/6/2022	RPS	Correspondence	Email correspondence, phone calls re: initial disclosures, offer, litigation strategy	0.57	\$500.00	\$285.00
5/8/2022	RPS	Correspondence	Email correspondence re: offer of judgment	0.37	\$500.00	\$185.00

5/9/2022	RPS	Phone call from client	Phone conference w/client & co-counsel re: [REDACTED]	0.79	\$500.00	\$395.00
5/12/2022	RPS	Correspondence	Email correspondence re: potential settlement, Court status update	0.98	\$500.00	\$490.00
5/16/2022	RPS	Correspondence	Email correspondence re: settlement issues	0.34	\$500.00	\$170.00
5/17/2022	RPS	Correspondence	Email correspondence re: settlement issues; draft settlement offer	0.22	\$500.00	\$110.00
5/18/2022	RPS	Review	Review settlement agreement; email correspondence re: same	1.62	\$500.00	\$810.00
5/19/2022	RPS	Correspondence	Email correspondence re: settlement, stay	0.23	\$500.00	\$115.00
6/2/2022	RPS	Correspondence	Various email correspondence re: settlement issues	0.27	\$500.00	\$135.00
6/7/2022	RPS	Meeting	Phone conference w/local counsel re: [REDACTED]	0.36	\$500.00	\$180.00
6/8/2022	RPS	Review	Review correspondence & drafts re: settlement agreement	0.57	\$500.00	\$285.00
6/9/2022	RPS	Review	Review draft settlement agreement	0.82	\$500.00	\$410.00
6/20/2022	RPS	Phone other	Phone call w/co-counsel re: [REDACTED]; email correspondence re: same	0.44	\$500.00	\$220.00
6/23/2022	RPS	Review	Review various email correspondence re: [REDACTED]; meeting w/SLS re: [REDACTED]	0.74	\$500.00	\$370.00
6/24/2022	RPS	Review	Review edits to settlement agreement	0.52	\$500.00	\$260.00
6/28/2022	RPS	Review	Review various correspondence re: settlement agreement; response to same	0.44	\$500.00	\$220.00
6/29/2022	RPS	Correspondence	Email correspondence re: settlement	0.29	\$500.00	\$145.00
7/10/2022	RPS	Correspondence	Email correspondence re: extension, 26(f) report	0.41	\$500.00	\$205.00
8/18/2022	RPS	Meeting	Meeting w/SKR to discuss [REDACTED]	0.17	\$500.00	\$85.00
8/19/2022	RPS	Phone call from client	Review revised settlement agreement; phone call w/client re: [REDACTED]; email correspondence re: same	1.72	\$500.00	\$860.00

8/21/2022	RPS	Correspondence	Various email correspondence re: settlement	0.23	\$500.00	\$115.00
8/31/2022	RPS	Phone other	Phone call w/client	0.84	\$500.00	\$420.00
9/16/2022	RPS	Draft Documents	Draft letter to client	0.12	\$500.00	\$60.00
10/5/2022	RPS	Phone other	Phone conference w/legal team; review of email correspondence & documents re: settlement; email correspondence re: settlement & status conference	0.44	\$500.00	\$220.00
10/14/2022	RPS	Review	Review new City redlining of settlement agreement; email correspondence re: same	0.78	\$500.00	\$390.00
10/23/2022	RPS	Correspondence	Email correspondence re: settlement	0.33	\$500.00	\$165.00
10/25/2022	RPS	Correspondence	Email correspondence and phone conference re: settlement agreement	0.56	\$500.00	\$280.00
10/27/2022	RPS	Review	Review latest draft of settlement agreement; email correspondence & meeting w/SLS re: same	0.34	\$500.00	\$170.00
Subtotal				80.47		\$40,235.00

DECLARATION OF ROMAN P. STORZER
EXHIBIT B

Timekeeper:	Bailey Nick	Paralegal				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
11/18/2021	BN	Meeting	Meeting with JSG about [Redacted]	0.14	\$125.00	\$17.50
11/18/2021	BN	Draft Documents	Compiling exhibits for JSG for URU mediation	1.42	\$125.00	\$177.50
11/29/2021	BN	Conference with client	Conference call with SKR and JSG re: [Redacted]	1.02	\$125.00	\$127.50
11/30/2021	BN	Review	Review mediation memo for URU	1.87	\$125.00	\$233.75
3/28/2022	BN	Discovery Preparation	Creating social media spread sheet/filling in, Page Vaulting	1.95	\$125.00	\$243.75
4/12/2022	BN	Correspondence	Correspondence with JSG re: Calendar Case Management Conference and deadline for Motion	0.22	\$125.00	\$27.50
4/12/2022	BN	Draft Documents	Draft Rule 26 report form	1.36	\$125.00	\$170.00
4/14/2022	BN	Draft Documents	Draft rule 26F report	1.60	\$125.00	\$200.00
4/15/2022	BN	Draft Documents	Draft rule 26F report	2.28	\$125.00	\$285.00
4/15/2022	BN	Meeting	Meeting with JSG, SKR re: [Redacted]	1.14	\$125.00	\$142.50
4/18/2022	BN	Draft Documents	Federal 502(d) Order	1.18	\$125.00	\$147.50
4/19/2022	BN	Draft Documents	Rule 26(F) Report of the Parties, Federal ESI Order, Federal 502(d) Order	1.95	\$125.00	\$243.75
4/25/2022	BN	Draft Documents	Draft URU: Rule 26(F) Report of the Parties	0.16	\$125.00	\$20.00
4/28/2022	BN	Draft Documents	Draft Plaintiffs' Initial Disclosures (federal)	0.49	\$125.00	\$61.25
5/9/2022	BN	Draft Documents	URU -- Plaintiffs' Initial Disclosures (Federal)	2.54	\$125.00	\$317.50
5/16/2022	BN	Draft Documents	Settlement Documents	2.30	\$125.00	\$287.50
5/18/2022	BN	Document Review	File Review of November 22, 2021 and December 6, 2021 minutes	2.59	\$125.00	\$323.75
7/8/2022	BN	Draft Documents	Plaintiffs' Initial Disclosures	1.43	\$125.00	\$178.75
Subtotal				25.64		\$3,205.00

Timekeeper:	Steven Silvia	Paralegal				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
8/12/2021	SS	Draft Documents	Litigation hold letters	0.54	\$125.00	\$67.50
9/20/2021	SS	Draft Documents	Drafted Pro Hac Vice documents	2.36	\$125.00	\$295.00
9/27/2021	SS	Draft Documents	Drafted corporate disclosure forms	0.26	\$125.00	\$32.50
9/27/2021	SS	Draft Documents	Drafted Pro Hac Vice documents	1.12	\$125.00	\$140.00
9/28/2021	SS	Draft Documents	Researched and revised Pro Hac Vice documents based on SKR notes	2.54	\$125.00	\$317.50
10/4/2021	SS	Meeting	Zoom Call on NextPoint Issues	0.92	\$125.00	\$115.00
10/4/2021	SS	Draft Documents	Drafted Pro Hac Vice documents for RPS and EWT	0.80	\$125.00	\$100.00
10/11/2021	SS	Meeting	Zoom Call on Redaction Issues	0.42	\$125.00	\$52.50
10/12/2021	SS	Draft Documents	Revisions to Pro Hac Vice documents	0.81	\$125.00	\$101.25
10/13/2021	SS	Document Review	Made revisions to Press Release and communicated with press contacts	0.54	\$125.00	\$67.50
2/9/2022	SS	Document Review	Joint Status Report	0.53	\$125.00	\$66.25
3/30/2022	SS	Correspondence	Researched contact information for conference call	0.52	\$125.00	\$65.00
5/31/2022	SS	Draft Documents	Drafted Pro Hac Vice documents for SLS	2.12	\$125.00	\$265.00
8/16/2022	SS	Discovery Preparation	Reviewed and captured social media	2.96	\$125.00	\$370.00
9/8/2022	SS	Document Review	Reviewed and captured social media	2.73	\$125.00	\$341.25
9/14/2022	SS	Discovery Preparation	Review social media	2.02	\$125.00	\$252.50
9/21/2022	SS	Meeting	Meeting concerning settlement documents	0.53	\$125.00	\$66.25
9/28/2022	SS	Discovery Preparation	Captured social media	2.16	\$125.00	\$270.00
9/30/2022	SS	Discovery Preparation	Uploaded documents to the discovery database	0.73	\$125.00	\$91.25
10/26/2022	SS	Discovery Preparation	Captured social media and searched news media	2.77	\$125.00	\$346.25
11/2/2022	SS	Draft Documents	Drafted a joint stipulation for an extension of time	1.36	\$125.00	\$170.00
11/4/2022	SS	Draft Documents	Attorneys fees spreadsheet	0.69	\$125.00	\$86.25
Subtotal				29.43		\$3,678.75

Timekeeper:	Gina DeFrancisci	Paralegal				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
9/17/2021	GD	Draft Documents	Drafting corp. disclosure statement and civil cover sheet.	2.26	\$125.00	\$282.50
9/27/2021	GD	Draft Documents	Corporate disclosure statements and cover sheet	0.98	\$125.00	\$122.50
10/11/2021	GD	Draft Documents	Editing civil cover sheet	0.07	\$125.00	\$8.75
11/30/2021	GD	Document Review	Cite checking mediation memorandum	0.49	\$125.00	\$61.25
4/22/2022	GD	Document Review	Compare of Answer and Complaint and indicate responses	4.82	\$125.00	\$602.50
4/25/2022	GD	Document Review	Compare of Answer and Complaint and indicate responses	0.03	\$125.00	\$3.75
4/27/2022	GD	Draft Documents	Plaintiffs' Initial Disclosures	0.89	\$125.00	\$111.25
5/2/2022	GD	Draft Documents	Edits to ESI order	0.77	\$125.00	\$96.25
5/18/2022	GD	Document Review	Settlement Agreement cite checking	3.38	\$125.00	\$422.50
6/6/2022	GD	Document Review	Compare settlement documents	0.22	\$125.00	\$27.50
8/19/2022	GD	Draft Documents	Creating compare document of two Settlement Agreements	0.05	\$125.00	\$6.25
9/21/2022	GD	Draft Documents	Edits to Settlement Documents	0.25	\$125.00	\$31.25
9/22/2022	GD	Draft Documents	Edits to Draft Agreement	0.70	\$125.00	\$87.50
12/5/2022	GD	Conference with client	SKR and SLS [REDACTED]discussion	0.19	\$125.00	\$23.75
12/5/2022	GD	Draft Documents	Declarations for Fees Petition	1.15	\$125.00	\$143.75
12/5/2022	GD	Draft Documents	Spreadsheets of costs for Fee Application	0.61	\$125.00	\$76.25
12/6/2022	GD	Draft Documents	Spreadsheets of attorney's fees for Fee Application	6.86	\$125.00	\$857.50
12/6/2022	GD	Phone other	L. Sacher for conference call	0.06	\$125.00	\$7.50
12/7/2022	GD	Draft Documents	Spreadsheets of attorney's fees for Fee Petition	6.19	\$125.00	\$773.75
12/7/2022	GD	Draft Documents	Declarations for Fees Petition	0.17	\$125.00	\$21.25
12/7/2022	GD	Draft Documents	Drafting Memorandum and Motion for Fee Petition	0.28	\$125.00	\$35.00
Subtotal				30.42		\$3,802.50

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

DECLARATION OF ERIC W. TREENE

DECLARATION OF ERIC W. TREENE

Eric W. Treene declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Storzer & Associates, P.C., attorneys for the Plaintiffs, 1025 Connecticut Ave. NW, Suite 1000, Washington, D.C. 20036, and am duly admitted to practice law in the State of New York and the District of Columbia.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendant.
3. This Declaration is based on my own personal knowledge.
4. I am a graduate of Amherst College and Harvard Law School.
5. I was admitted to practice law in the State of New York in 1993.
6. I have been employed by Storzer & Associates, P.C. since July 2021. I work in the statutory and constitutional religious freedom litigation field exclusively for the firm. Prior to joining Storzer and Associates, I was Special Counsel for Religious Discrimination at the United States Justice Department for 19 years. I provided

leadership for the Department on a wide range of religious liberty issues, including developing and overseeing the Department's enforcement program for the Religious Land Use and Institutionalized Persons Act (RLUIPA); overseeing religion-related litigation for the Department's Civil Rights Division under various other statutes including the Fair Housing Act and Title VII; testifying before the U.S. Senate on religious hate crimes and developing training programs for local law enforcement and religious community leaders on protecting places of worship; and leading the Department's efforts on protecting religious liberty rights during the COVID-19 epidemic. I have also represented the United States in a range of Free Exercise, Free Speech, and RLUIPA cases in the U.S. District Courts, various U.S. Courts of Appeals, and the United States Supreme Court. Prior to my tenure at the Department of Justice, I was Director of Litigation at the Becket Fund for Religious Liberty in Washington D.C., where I engaged in a wide range of First Amendment cases over a seven-year period. I am the author of a number of articles and book chapters on religious liberty issues and I have lectured widely on the subject in law schools and universities in the U.S. as well as in Spain and Malaysia. I am also an adjunct professor at The Catholic University of America's Columbus School of Law and a Fellow at its Center for Religious Liberty.

7. My services in this litigation were billed out at \$500.00 per hour.
8. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of these records. It reflects 32.54 hours of billable attorney time I spent on this matter.

9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023



Eric W. Treene

**DECLARATION OF ERIC W. TREENE
EXHIBIT A**

Timekeeper:	Eric W. Treene	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
8/25/2021	EWT	Phone other	Call with RPS re: [Redacted]	0.25	\$500.00	\$125.00
8/26/2021	EWT	Phone other	Call with JSG re: [Redacted]	0.50	\$500.00	\$250.00
8/26/2021	EWT	Draft Documents	Drafting complaint	1.25	\$500.00	\$625.00
9/1/2021	EWT	Phone other	Call with JSG re: [Redacted]	0.25	\$500.00	\$125.00
9/9/2021	EWT	Phone other	Call with JSG re: [Redacted]	0.50	\$500.00	\$250.00
9/13/2021	EWT	Draft Documents	Editing complaint	1.50	\$500.00	\$750.00
9/20/2021	EWT	Draft Documents	Editing complaint	1.75	\$500.00	\$875.00
9/22/2021	EWT	Phone other	call with SKR re: [Redacted]	0.25	\$500.00	\$125.00
9/27/2021	EWT	Draft Documents	Reviewing and editing complaint	0.50	\$500.00	\$250.00
10/13/2021	EWT	Document Review	Review press release	0.25	\$500.00	\$125.00
10/13/2021	EWT	Draft Documents	Complaint revisions	0.33	\$500.00	\$165.00
11/1/2021	EWT	Document Review	Reviewing mediation statement	1.00	\$500.00	\$500.00
11/9/2021	EWT	Research	Correspondence with DOJ re complaint, reviewing code to respond to questions	0.83	\$500.00	\$415.00
11/14/2021	EWT	Other	Email to RS re: [REDACTED]	0.17	\$500.00	\$85.00
12/23/2021	EWT	Draft Documents	Revising mediation statement	1.50	\$500.00	\$750.00
4/27/2022	EWT	Discovery Preparation	Review discovery plan	1.00	\$500.00	\$500.00
4/29/2022	EWT	Phone other	Call with SKR and JGS re: [Redacted]	0.40	\$500.00	\$200.00
5/2/2022	EWT	Discovery Preparation	Reviewing and editing discovery plan.	0.45	\$500.00	\$225.00
5/3/2022	EWT	Correspondence	Correspondence regarding case management plan conference.	0.08	\$500.00	\$40.00
5/4/2022	EWT	Discovery Preparation	Reviewing recommendations of co-counsel for [Redacted]	0.12	\$500.00	\$60.00
5/6/2022	EWT	Document Review	Reviewing proposed notice of judgment.	0.09	\$500.00	\$45.00
5/6/2022	EWT	Document Review	Reviewing offer of judgment.	0.13	\$500.00	\$65.00
5/9/2022	EWT	Document Review	Review settlement proposal and memo from JG [Redacted]; phone call with client and local counsel.	1.38	\$500.00	\$690.00
5/10/2022	EWT	Draft Documents	Preparing response to Offer of Judgment.	0.22	\$500.00	\$110.00

5/12/2022	EWT	Draft Documents	Internal correspondence re: response to offer of judgment research on [REDACTED] call with local counsel; revising offer of judgment.	1.38	\$500.00	\$690.00
5/13/2022	EWT	Draft Documents	Drafting alternative offer of judgment.	0.29	\$500.00	\$145.00
5/13/2022	EWT	Phone call with opposing Attorney	Call with opposing counsel re. settlement; email to co-counsel about [REDACTED]	0.50	\$500.00	\$250.00
5/15/2022	EWT	Draft Documents	Drafting settlement agreement.	0.81	\$500.00	\$405.00
5/17/2022	EWT	Draft Documents	Revising proposed settlement agreement; call with team re same.	1.56	\$500.00	\$780.00
5/18/2022	EWT	Draft Documents	Revising settlement agreement.	0.36	\$500.00	\$180.00
5/19/2022	EWT	Correspondence	Correspondence re [REDACTED]	0.07	\$500.00	\$35.00
5/27/2022	EWT	Correspondence	Letter to client.	0.30	\$500.00	\$150.00
5/29/2022	EWT	Correspondence	Correspondence with attorney in criminal case re. [REDACTED]	0.28	\$500.00	\$140.00
5/31/2022	EWT	Other	Communications re. [REDACTED]	0.13	\$500.00	\$65.00
6/1/2022	EWT	Correspondence	Correspondence re. [REDACTED]	0.27	\$500.00	\$135.00
6/2/2022	EWT	Correspondence	Correspondence re. [REDACTED]	0.21	\$500.00	\$105.00
6/6/2022	EWT	Document Review	Reviewing draft settlement.	0.49	\$500.00	\$245.00
6/7/2022	EWT	Legal Research	Legal Research on [REDACTED]	0.09	\$500.00	\$45.00
6/7/2022	EWT	Phone other	Call with local counsel re. [REDACTED]	0.37	\$500.00	\$185.00
6/7/2022	EWT	Legal Research	Research on [REDACTED]	0.05	\$500.00	\$25.00
6/8/2022	EWT	Draft Documents	Revising settlement agreement.	0.24	\$500.00	\$120.00
6/8/2022	EWT	Phone call from client	Phone call with client and local counsel on [REDACTED]	0.34	\$500.00	\$170.00
6/8/2022	EWT	Draft Documents	Revising settlement agreement draft.	0.55	\$500.00	\$275.00
6/10/2022	EWT	Draft Documents	Revising draft settlement.	0.10	\$500.00	\$50.00
6/16/2022	EWT	Draft Documents	Reviewing settlement agreement.	0.19	\$500.00	\$95.00
6/28/2022	EWT	Correspondence	Internal correspondence re. [REDACTED]	0.11	\$500.00	\$55.00
6/28/2022	EWT	Phone call from client	Call with client about [REDACTED]	0.95	\$500.00	\$475.00
7/7/2022	EWT	Other	Correspondence with local counsel re. [REDACTED]	0.12	\$500.00	\$60.00

7/7/2022	EWT	Other	Reviewing demand disclosure requirements; internal communication re. [REDACTED]; call with SR and SS re. pretrial conference and initial disclosure.	0.29	\$500.00	\$145.00
7/20/2022	EWT	Meeting	Zoom meeting with local counsel re. [REDACTED]	0.29	\$500.00	\$145.00
7/21/2022	EWT	Correspondence	Internal correspondence re. [REDACTED]	0.07	\$500.00	\$35.00
7/21/2022	EWT	Court	Appearance for Hearing Status conference by Zoom.	0.53	\$500.00	\$265.00
8/9/2022	EWT	Phone other	Call with local counsel re. [REDACTED]	0.36	\$500.00	\$180.00
8/9/2022	EWT	Phone other	Call with local counsel re. [REDACTED]	0.36	\$500.00	\$180.00
8/18/2022	EWT	Document Review	Reviewing City's settlement offer revisions.	0.23	\$500.00	\$115.00
8/22/2022	EWT	Document Review	Reviewing new plans for Shul.	0.12	\$500.00	\$60.00
8/31/2022	EWT	Document Review	Reviewing SR memo on [REDACTED]; reviewing complaint and remedies sought.	1.06	\$500.00	\$530.00
9/2/2022	EWT	Phone other	Call with John Slagter (local counsel), SR and SS regarding [REDACTED]	0.35	\$500.00	\$175.00
9/19/2022	EWT	Document Review	Call with SR and SS; [REDACTED]	0.29	\$500.00	\$145.00
9/21/2022	EWT	Legal Research	Legal research on [REDACTED]; reviewing memorandum on same	0.08	\$500.00	\$40.00
9/22/2022	EWT	Legal Research	Reviewing research on [REDACTED]	0.35	\$500.00	\$175.00
9/23/2022	EWT	Legal Research	Research on [REDACTED], email to SKR and SS on same	0.17	\$500.00	\$85.00
10/17/2022	EWT	Draft Documents	Reviewing and revising settlement/consent decree.	0.82	\$500.00	\$410.00
10/24/2022	EWT	Draft Documents	Revising settlement agreement.	0.26	\$500.00	\$130.00
10/25/2022	EWT	Draft Documents	Revising settlement agreement.	0.34	\$500.00	\$170.00
10/26/2022	EWT	Draft Documents	Revising settlement agreement.	0.41	\$500.00	\$205.00
10/27/2022	EWT	Draft Documents	Revising settlement agreement.	1.01	\$500.00	\$505.00
11/1/2022	EWT	Draft Documents	Revising settlement.	0.14	\$500.00	\$70.00
11/1/2022	EWT	Phone other	Call with SS and local counsel re. [REDACTED]	0.25	\$500.00	\$125.00

11/3/2022	EWT	Court Appearance	Court appearance--status conference via Zoom.	0.30	\$500.00	\$150.00
Subtotal				32.54		\$16,270.00

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

**DECLARATION OF SIEGLINDE
K. RATH**

DECLARATION OF SIEGLINDE K. RATH

Sieglinde K. Rath declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Storzer & Associates, P.C., 9433 Common Brook Road, Owings Mills, Maryland 21117, attorneys for the Plaintiffs, and am duly admitted to practice law in the courts of the States of Maryland and New Jersey, and the United States District Courts for the Districts of Maryland and New Jersey.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendants.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in Maryland in 1989 and New Jersey in 1991.
5. I graduated from the University of Maryland law school in 1989, where I was Articles Editor of the Maryland Journal of International Law and Trade and on the Moot Court Board.

6. I practiced law at various law firms, including as a partner at Benbrook and Benbrook, LLC, a general litigation firm with a focus on municipal, family, land use, and business law located in Clinton, N.J. for 23 years. I have been employed by Storzer & Associates, P.C. since February 2016 working in the field of religious liberty and land use and constitutional litigation for the firm. My cases at the firm include litigation arising out of the First and Fourteenth Amendments to the United States Constitution, the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. § 2000cc, *et seq.* and the Fair Housing Act, 42 U.S.C. § 3601, *et seq.*
7. My services in this litigation were billed out at \$500.00 per hour.
8. Throughout the course of this litigation I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of my contemporaneous time records of legal services performed in this matter. It reflects 96.76 hours of attorney time spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023



Sieglinde K. Rath

DECLARATION OF SIEGLINDE K. RATH
EXHIBIT A

Timekeeper:	Sieglinde K. Rath	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
8/6/2021	SKR	Correspondence	Emails re: planner retention	0.06	\$500.00	\$30.00
8/9/2021	SKR	Correspondence	Review litigation letters to client and emails re:same and ESI conference	0.23	\$500.00	\$115.00
8/9/2021	SKR	Meeting	Meeting with JSG re: status of case and emails re: same	0.46	\$500.00	\$230.00
8/9/2021	SKR	Phone other	Call with cocounsel and JSG re: [REDACTED]	0.08	\$500.00	\$40.00
8/10/2021	SKR	Meeting	Emails re: [REDACTED] and meet with JSG and RPS re: [REDACTED]	0.12	\$500.00	\$60.00
8/11/2021	SKR	Phone other	Call with BS and D. Markowitz re: [REDACTED]; call with JSG re: same	0.34	\$500.00	\$170.00
8/12/2021	SKR	Correspondence	Emails and call with JSG re: [REDACTED]	0.13	\$500.00	\$65.00
8/13/2021	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.39	\$500.00	\$195.00
8/20/2021	SKR	Discovery Preparation	Emails and calls re: expert retention; status of discovery	0.40	\$500.00	\$200.00
8/22/2021	SKR	Preparation	Preparation of complaint and emails regarding same with counsel	0.44	\$500.00	\$220.00
8/23/2021	SKR	Correspondence	Emails with cocounsel re: [REDACTED]	0.33	\$500.00	\$165.00
8/29/2021	SKR	Preparation of pleadings	Preparation of complaint and emails re: same	0.21	\$500.00	\$105.00
9/9/2021	SKR	Preparation	Preparation of federal complaint and review and revise same and call and emails with JSG and RPS re: same	1.04	\$500.00	\$520.00
9/9/2021	SKR	Phone other	Call with client and counsel re: [REDACTED] and emails re: same	0.73	\$500.00	\$365.00
9/11/2021	SKR	Preparation	Preparation of federal complaint and emails re: same	0.47	\$500.00	\$235.00
9/12/2021	SKR	Preparation	Preparation of complaint and emails re: same	0.60	\$500.00	\$300.00
9/13/2021	SKR	Preparation	Preparation of federal complaint and meeting and emails with JSG re: same	0.72	\$500.00	\$360.00

9/14/2021	SKR	Discovery Preparation	Emails and call with expert re: [REDACTED]	0.57	\$500.00	\$285.00
9/14/2021	SKR	Meeting	Meeting with planning expert and call and emails re: same	0.09	\$500.00	\$45.00
9/14/2021	SKR	Preparation	Meeting with JSG; emails with counsel and legal research re: [REDACTED]	1.51	\$500.00	\$755.00
9/15/2021	SKR	Preparation	Preparation of complaint and calls and emails re: same	3.42	\$500.00	\$1,710.00
9/16/2021	SKR	Preparation	Preparation of complaint and emails re: same and legal research	2.66	\$500.00	\$1,330.00
9/17/2021	SKR	Preparation	Preparation of complaint and calls and emails re:same	2.05	\$500.00	\$1,025.00
9/19/2021	SKR	Preparation	Preparation of federal complaint; revisions	0.34	\$500.00	\$170.00
9/20/2021	SKR	Correspondence	Emails and call with JSG re: PHV applications; review court rule re: same	0.13	\$500.00	\$65.00
9/20/2021	SKR	Preparation	Preparation of complaint and calls and emails re: same	0.40	\$500.00	\$200.00
9/22/2021	SKR	Correspondence	Emails and call with counsel re: [REDACTED]	0.15	\$500.00	\$75.00
9/24/2021	SKR	Preparation	Emails and calls with JG re: [REDACTED]	0.28	\$500.00	\$140.00
9/26/2021	SKR	Correspondence	Emails re: federal complaint and status	0.11	\$500.00	\$55.00
9/27/2021	SKR	Preparation	Preparation of federal complaint; prepare corporate disclosure forms and civil cover sheet; calls and emails with cocounsel re: same	0.73	\$500.00	\$365.00
9/28/2021	SKR	Review	Review PHV applications and emails re: same	0.68	\$500.00	\$340.00
9/30/2021	SKR	Correspondence	Emails re: status and evidence and calls with JSG re: same	0.11	\$500.00	\$55.00
10/4/2021	SKR	Phone other	Calls and email re: status of federal complaint with JSG; cocounsel	0.10	\$500.00	\$50.00
10/4/2021	SKR	Discovery Preparation	Emails re: [REDACTED] with cocounsel; meet with JSG and SAS re: same	0.24	\$500.00	\$120.00
10/5/2021	SKR	Correspondence	Emails re: [REDACTED] with JSG	0.05	\$500.00	\$25.00

10/5/2021	SKR	Phone other	Call and emails with cocounsel re: [REDACTED]	0.16	\$500.00	\$80.00
10/6/2021	SKR	Phone other	Calls and emails with cocounsel re: filing of federal complaint	0.45	\$500.00	\$225.00
10/7/2021	SKR	Correspondence	Emails with JSG re: [REDACTED]	0.08	\$500.00	\$40.00
10/7/2021	SKR	Correspondence	Emails and calls with cocounsel re: [REDACTED]; calls re: preparation of complaint	0.47	\$500.00	\$235.00
10/8/2021	SKR	Correspondence	Emails and review of Press Release	0.25	\$500.00	\$125.00
10/10/2021	SKR	Preparation	Emails re: preparation of federal complaint with cocounsel	0.27	\$500.00	\$135.00
10/11/2021	SKR	Preparation	Call and emails with counsel re: status and preparation of federal complaint and meet with SAS and JSG re: same	1.68	\$500.00	\$840.00
10/12/2021	SKR	Phone other	Call with JSG re: [REDACTED]	0.02	\$500.00	\$10.00
10/12/2021	SKR	Review	Review press release and emails with RPS	0.07	\$500.00	\$35.00
10/13/2021	SKR	Correspondence	Emails and call re: press release and call with JSG re: filing and service of the complaint	0.20	\$500.00	\$100.00
10/14/2021	SKR	Correspondence	Email and meet with JSG re: service of complaint and press inquiry	0.29	\$500.00	\$145.00
10/19/2021	SKR	Phone other	Call with JSG and email to John Slaghter re: mediation dates	0.18	\$500.00	\$90.00
10/21/2021	SKR	Phone other	Call re: mediation and timing with counsel and emails re: deadlines; emails and calls with cocounsel re: same	0.48	\$500.00	\$240.00
10/22/2021	SKR	Correspondence	Emails with counsel and client re; [REDACTED]	0.04	\$500.00	\$20.00
10/25/2021	SKR	Correspondence	Email with cocounsel re: [REDACTED]	0.01	\$500.00	\$5.00
10/27/2021	SKR	Correspondence	Emails and meet re: [REDACTED]	0.15	\$500.00	\$75.00
10/28/2021	SKR	Phone other	Call with JSG re: preparation of mediation statement	0.15	\$500.00	\$75.00
10/31/2021	SKR	Preparation	Preparation of mediation objectives - emails re: same	0.08	\$500.00	\$40.00

11/1/2021	SKR	Preparation	Preparation of mediation statement-review and revise; emails and meeting with cocounsel re: same	1.21	\$500.00	\$605.00
11/2/2021	SKR	Preparation	Preparation of mediation statement and meet and emails with JSG re: same	0.82	\$500.00	\$410.00
11/2/2021	SKR	Correspondence	Emails re: PC meeting and meet with JSG and BEN re: same	0.12	\$500.00	\$60.00
11/4/2021	SKR	Meeting	Meeting with JSG re: [REDACTED]	0.06	\$500.00	\$30.00
11/7/2021	SKR	Discovery Preparation	Review City meeting and emails with JSG	0.17	\$500.00	\$85.00
11/8/2021	SKR	Meeting	Meeting with JSG re: status of mediation statement	0.04	\$500.00	\$20.00
11/8/2021	SKR	Review	Review Motion to dismiss filed by City and emails re: [REDACTED] and meet and calls with cocounsel re: [REDACTED]	0.70	\$500.00	\$350.00
11/8/2021	SKR	Preparation	Meet with JSG and review mediation statement; call with client and JSG re: [REDACTED]; call with cocounsel re: [REDACTED]	0.60	\$500.00	\$300.00
11/9/2021	SKR	Review	Review stipulation for stay and mediation and emails with JSG re:[REDACTED]	0.07	\$500.00	\$35.00
11/9/2021	SKR	Correspondence	Emails and call with cocounsel re: [REDACTED]	0.16	\$500.00	\$80.00
11/10/2021	SKR	Review	Review and revise federal stay order and mediation and emails with cocounsel re: [REDACTED]; call with JSG re: [REDACTED]	0.38	\$500.00	\$190.00
11/11/2021	SKR	Review	Emails and calls with cocounsel re: mediation and review mediation statement	0.55	\$500.00	\$275.00
11/12/2021	SKR	Preparation	Preparation of mediation statement and emails and calls re: same and status	0.73	\$500.00	\$365.00
11/14/2021	SKR	Correspondence	Review and revise mediation statement and emails re: same	0.54	\$500.00	\$270.00
11/15/2021	SKR	Correspondence	Emails with cocounsel re: [REDACTED]	0.02	\$500.00	\$10.00

11/17/2021	SKR	Review	Review mediation statement and emails re: same	0.35	\$500.00	\$175.00
11/19/2021	SKR	Phone other	Calls re: [REDACTED] with BEN and JSG	1.42	\$500.00	\$710.00
11/24/2021	SKR	Phone other	Call with JSG re: [REDACTED]	0.18	\$500.00	\$90.00
11/29/2021	SKR	Phone other	Calls and emails with counsel and staff re: [REDACTED]	1.35	\$500.00	\$675.00
12/1/2021	SKR	Correspondence	Emails and call re: [REDACTED] with cocounsel	0.14	\$500.00	\$70.00
12/6/2021	SKR	Meeting	Meeting with JSG re: [REDACTED]	0.09	\$500.00	\$45.00
12/8/2021	SKR	Correspondence	Emails with JSG re: status; Zoom call with cocounsel re: [REDACTED]	0.07	\$500.00	\$35.00
12/14/2021	SKR	Phone other	Call with JSG re: [REDACTED]	0.02	\$500.00	\$10.00
12/15/2021	SKR	Meeting	Meet with JSG and emails re: [REDACTED]	0.10	\$500.00	\$50.00
12/17/2021	SKR	Preparation	Call with JSG re: [REDACTED]	0.44	\$500.00	\$220.00
12/19/2021	SKR	Preparation	Preparation of supplemental mediation statement; review of same	0.03	\$500.00	\$15.00
12/20/2021	SKR	Review	Review supplemental mediation statement and emails re: same	0.09	\$500.00	\$45.00
12/27/2021	SKR	Phone other	Calls and email with JSG re: [REDACTED]	0.30	\$500.00	\$150.00
12/27/2021	SKR	Review	Review mediation statement supplement	0.41	\$500.00	\$205.00
1/6/2021	SKR	Correspondence	Meet with JSG re: deadlines and emails with cocounsel re: same	0.26	\$500.00	\$130.00
1/11/2022	SKR	Phone other	Call with JSG re: [REDACTED] re: same	0.06	\$500.00	\$30.00
1/11/2022	SKR	Correspondence	Revise joint status report and email re: same	0.10	\$500.00	\$50.00
1/12/2022	SKR	Phone other	Call with KAS and JSG re: [REDACTED]	0.04	\$500.00	\$20.00
1/13/2022	SKR	Phone other	Call with JSG re: [REDACTED]	0.04	\$500.00	\$20.00
1/14/2022	SKR	Correspondence	Call with JSG and emails re: [REDACTED]	0.06	\$500.00	\$30.00
1/21/2022	SKR	Phone other	Call with JSG re: [REDACTED]	0.18	\$500.00	\$90.00

1/25/2022	SKR	Correspondence	Emails and call re: [REDACTED] with cocounsel in the case	0.08	\$500.00	\$40.00
1/31/2022	SKR	Phone other	Call and email with JSG re: [REDACTED] letter to Court	0.55	\$500.00	\$275.00
2/4/2022	SKR	Phone other	Call with JSG re: [REDACTED]	0.13	\$500.00	\$65.00
2/7/2022	SKR	Meeting	Meet with JSG and emails re: [REDACTED]	0.04	\$500.00	\$20.00
2/8/2022	SKR	Phone other	Calls and emails re: [REDACTED]	0.24	\$500.00	\$120.00
2/10/2022	SKR	Correspondence	Emails re: status report and review same and meet with JSG re: [REDACTED]	0.11	\$500.00	\$55.00
2/10/2022	SKR	Phone other	Calls and emails with cocounsel in case re: [REDACTED]	0.88	\$500.00	\$440.00
2/10/2022	SKR	Phone call from client	Phone call with client and JSG re: [REDACTED]	0.17	\$500.00	\$85.00
2/15/2022	SKR	Correspondence	Emails re: meeting with counsel and client	0.08	\$500.00	\$40.00
2/16/2022	SKR	Phone other	Call with JSG re: [REDACTED]	0.09	\$500.00	\$45.00
2/17/2022	SKR	Correspondence	Emails with cocounsel re: [REDACTED]	0.16	\$500.00	\$80.00
2/21/2022	SKR	Correspondence	Emails re: [REDACTED] with cocounsel in case	0.07	\$500.00	\$35.00
2/22/2022	SKR	Correspondence	Emails, meet and texts with JSG re: [REDACTED]; conference call with cocounsel and emails re: [REDACTED]	0.23	\$500.00	\$115.00
2/23/2022	SKR	Phone other	Emails and call with JSG re: [REDACTED]	0.09	\$500.00	\$45.00
2/23/2022	SKR	Phone other	Calls with cocounsel re: [REDACTED]	0.20	\$500.00	\$100.00
2/23/2022	SKR	Correspondence	Emails and call with cocounsel re: [REDACTED]	0.20	\$500.00	\$100.00
2/24/2022	SKR	Correspondence	Emails and call with JSG re: [REDACTED]	0.05	\$500.00	\$25.00
3/1/2022	SKR	Meeting	Meeting with JSG re: [REDACTED] and emails re: same with cocounsel	0.14	\$500.00	\$70.00
3/1/2022	SKR	Meeting	Meeting with JSG re: [REDACTED]	0.27	\$500.00	\$135.00
3/2/2022	SKR	Correspondence	Emails re: [REDACTED]	0.06	\$500.00	\$30.00
3/3/2022	SKR	Phone other	Call with JSG and emails/texts re: [REDACTED]	0.07	\$500.00	\$35.00

3/4/2022	SKR	Meeting	Meet with JSG and emails re: enforcement language for mediator; review mediator proposal	0.86	\$500.00	\$430.00
3/7/2022	SKR	Review	Review Mediator Proposal and meet with JSG re: [REDACTED]; email re: same	0.25	\$500.00	\$125.00
3/9/2022	SKR	Phone other	Call and emails with JSG and counsel re: stay of case	0.22	\$500.00	\$110.00
3/10/2022	SKR	Correspondence	Emails re: status with cocounsel/Court	0.04	\$500.00	\$20.00
3/11/2022	SKR	Phone other	Call and emails with JSG re: [REDACTED]	0.08	\$500.00	\$40.00
3/14/2022	SKR	Phone other	Calls and emails with JSG and cocounsel re: [REDACTED]	0.22	\$500.00	\$110.00
3/23/2022	SKR	Correspondence	Emails and call with JSG re: [REDACTED]	0.13	\$500.00	\$65.00
3/23/2022	SKR	Correspondence	Emails and call with JSG and SAS re: [REDACTED]	0.41	\$500.00	\$205.00
3/23/2022	SKR	Conference with client	Conference call with client and cocounsel re: [REDACTED]	0.43	\$500.00	\$215.00
3/27/2022	SKR	Correspondence	Correspondence Emails re: [REDACTED]	0.03	\$500.00	\$15.00
3/28/2022	SKR	Discovery Preparation	Meet with BEN re: [REDACTED] and call with SAS; calls and emails with RPS and JSG re: [REDACTED]	0.31	\$500.00	\$155.00
3/29/2022	SKR	Correspondence	Emails re: conference call with client and adversary and call with JSG re: [REDACTED]	0.09	\$500.00	\$45.00
3/30/2022	SKR	Conference with client	Conference call with counsel and emails re: same; calls and emails with cocounsel re: same	0.51	\$500.00	\$255.00
3/31/2022	SKR	Correspondence	Emails and call with JSG re: [REDACTED]	0.31	\$500.00	\$155.00
4/4/2022	SKR	Phone other	Call and emails with JSG re: [REDACTED]	0.22	\$500.00	\$110.00
4/5/2022	SKR	Correspondence	Emails and call with counsel re: [REDACTED]	0.13	\$500.00	\$65.00
4/6/2022	SKR	Phone other	Calls and email with cocounsel re: [REDACTED]	0.64	\$500.00	\$320.00

4/7/2022	SKR	Phone other	Email and call with JSG re: [REDACTED]	0.10	\$500.00	\$50.00
4/8/2022	SKR	Correspondence	Emails with JSG re: [REDACTED]; call with JSG [REDACTED]	0.10	\$500.00	\$50.00
4/9/2022	SKR	Correspondence	Emails with JSG re: [REDACTED]	0.12	\$500.00	\$60.00
4/11/2022	SKR	Correspondence	Email with RPS re: [REDACTED]	0.06	\$500.00	\$30.00
4/11/2022	SKR	Review	Review stipulation; call and emails re: same	0.19	\$500.00	\$95.00
4/14/2022	SKR	Preparation	Preparation of Joint Discovery Plan and Initial Disclosures and call and email with JSG re: [REDACTED]	0.58	\$500.00	\$290.00
4/15/2022	SKR	Conference with client	Conference with RPS, EWT and JSG re: [REDACTED]	0.17	\$500.00	\$85.00
4/15/2022	SKR	Conference with client	Conference with JSG re: [REDACTED]	1.05	\$500.00	\$525.00
4/18/2022	SKR	Review	Review Answer filed by Defendants	0.10	\$500.00	\$50.00
4/18/2022	SKR	Correspondence	Emails re: case management conference and call with JSG re: [REDACTED]	0.10	\$500.00	\$50.00
4/19/2022	SKR	Preparation	Preparation of Case Management Plan-Review and discovery documents and emails re: same	0.48	\$500.00	\$240.00
4/20/2022	SKR	Preparation	Calls and emails with JSG re: [REDACTED]	0.39	\$500.00	\$195.00
4/22/2022	SKR	Phone other	Call and email with GMD re: [REDACTED]	0.18	\$500.00	\$90.00
4/22/2022	SKR	Preparation	Preparation of joint discovery plan	0.41	\$500.00	\$205.00
4/25/2022	SKR	Review	Review URU Complaint/Answer and call and email with GMD re: [REDACTED]	0.03	\$500.00	\$15.00
4/25/2022	SKR	Phone other	Call and email with JSG re: [REDACTED]	0.38	\$500.00	\$190.00
4/26/2022	SKR	Correspondence	Emails with cocounsel and meeting re: [REDACTED]	0.17	\$500.00	\$85.00
4/26/2022	SKR	Discovery Preparation	Review Initial Disclosures	0.26	\$500.00	\$130.00
4/26/2022	SKR	Correspondence	Conferences and emails with cocounsel re: [REDACTED]	0.33	\$500.00	\$165.00
4/27/2022	SKR	Preparation	Emails re: [REDACTED] with cocounsel and review same	0.18	\$500.00	\$90.00

4/29/2022	SKR	Review	Review ESI order and emails re: same	0.07	\$500.00	\$35.00
4/29/2022	SKR	Phone other	Emails and call with counsel re: [REDACTED]	0.40	\$500.00	\$200.00
5/2/2022	SKR	Correspondence	Emails, Zoom and call with cocounsel re: [REDACTED]	0.25	\$500.00	\$125.00
5/3/2022	SKR	Correspondence	ECF filing from court re: Conference	0.02	\$500.00	\$10.00
5/3/2022	SKR	Phone other	Call with JSG re: [REDACTED] re: same	0.16	\$500.00	\$80.00
5/3/2022	SKR	Discovery Preparation	Review initial disclosures	0.39	\$500.00	\$195.00
5/4/2022	SKR	Correspondence	Emails re: [REDACTED] with cocounsel and call with JSG re: [REDACTED]	0.18	\$500.00	\$90.00
5/5/2022	SKR	Discovery Preparation	Preparation of initial disclosures and call with JSG re: [REDACTED]	0.51	\$500.00	\$255.00
5/6/2022	SKR	Preparation	Preparation of initial disclosures - review same	0.27	\$500.00	\$135.00
5/6/2022	SKR	Correspondence	Emails and calls with cocounsel re: [REDACTED]	0.89	\$500.00	\$445.00
5/8/2022	SKR	Correspondence	Emails and call with cocounsel re: [REDACTED]	0.12	\$500.00	\$60.00
5/10/2022	SKR	Phone other	Call with JSG re: [REDACTED] re: [REDACTED]	0.16	\$500.00	\$80.00
5/12/2022	SKR	Correspondence	Emails and calls re: [REDACTED]	0.46	\$500.00	\$230.00
5/13/2022	SKR	Correspondence	Emails and calls re: [REDACTED]	0.41	\$500.00	\$205.00
5/13/2022	SKR	Preparation	Preparation of settlement agreement	0.64	\$500.00	\$320.00
5/14/2022	SKR	Preparation	Preparation of Settlement Agreement	2.53	\$500.00	\$1,265.00
5/15/2022	SKR	Preparation	Preparation of Settlement Agreement and calls with JSG re: [REDACTED]	0.89	\$500.00	\$445.00
5/16/2022	SKR	Preparation	Preparation of Settlement Agreement and emails and calls re: same	0.67	\$500.00	\$335.00
5/17/2022	SKR	Preparation	Review agreement and calls and emails re: same	1.58	\$500.00	\$790.00
5/18/2022	SKR	Preparation	Preparation of Agreement with emails and calls re: same	1.16	\$500.00	\$580.00
5/19/2022	SKR	Preparation	Emails and calls re: settlement status and offer of judgment; and review stipulation	0.61	\$500.00	\$305.00

5/24/2022	SKR	Correspondence	Emails with counsel re: status	0.10	\$500.00	\$50.00
5/25/2022	SKR	Correspondence	Email and call re: status	0.09	\$500.00	\$45.00
5/27/2022	SKR	Correspondence	Emails re: status	0.09	\$500.00	\$45.00
5/31/2022	SKR	Meeting	Meeting with SLS, KAS and GMD re: [REDACTED], call with cocounsel and emails re: [REDACTED]	0.40	\$500.00	\$200.00
6/1/2022	SKR	Correspondence	Emails and call with cocounsel; meet with SLS re: [REDACTED]; emails with client and ECF filing for extension	0.31	\$500.00	\$155.00
6/6/2022	SKR	Meeting	Meetings with SAS and SLS re: [REDACTED]; emails re: [REDACTED]	0.04	\$500.00	\$20.00
6/6/2022	SKR	Review	Review settlement agreement and emails re: same	0.38	\$500.00	\$190.00
6/7/2022	SKR	Preparation	Preparation of settlement agreement and email re: same	0.10	\$500.00	\$50.00
6/7/2022	SKR	Phone other	Conference call with counsel re: [REDACTED]; emails with cocounsel and client re: [REDACTED]	0.56	\$500.00	\$280.00
6/7/2022	SKR	Phone other	Call, emails and meeting with cocounsel re: [REDACTED]	0.17	\$500.00	\$85.00
6/8/2022	SKR	Preparation	Preparation of settlement agreement and emails and calls re: same	2.41	\$500.00	\$1,205.00
6/14/2022	SKR	Correspondence	Emails re: [REDACTED] with cocounsel; meet with cocounsel re: [REDACTED]	0.05	\$500.00	\$25.00
6/15/2022	SKR	Correspondence	Emails re: [REDACTED]	0.05	\$500.00	\$25.00
6/16/2022	SKR	Correspondence	Calls and emails re: [REDACTED]	0.22	\$500.00	\$110.00
6/17/2022	SKR	Correspondence	Emails re: [REDACTED] with cocounsel	0.30	\$500.00	\$150.00
6/20/2022	SKR	Phone other	Calls, meet and email with SLS re: [REDACTED]	0.28	\$500.00	\$140.00
6/20/2022	SKR	Phone other	Call with counsel re: status of settlement agreement and emails re: same	0.35	\$500.00	\$175.00
6/21/2022	SKR	Phone other	Calls and emails re: settlement status	0.12	\$500.00	\$60.00
6/23/2022	SKR	Preparation	Preparation of settlement agreement and review changes	1.32	\$500.00	\$660.00

6/24/2022	SKR	Phone other	Calls and emails with SLS re: [REDACTED]; emails re: [REDACTED]	0.63	\$500.00	\$315.00
6/27/2022	SKR	Phone other	Call and emails with cocounsel re: [REDACTED]; meet with SLS re: [REDACTED]	0.31	\$500.00	\$155.00
6/27/2022	SKR	Correspondence	ECF notice re: Stipulation extending offer and emails with counsel re: [REDACTED] and emails with client re: [REDACTED]	0.17	\$500.00	\$85.00
6/28/2022	SKR	Preparation	Calls and emails with cocounsel and client re: [REDACTED]	1.46	\$500.00	\$730.00
7/5/2022	SKR	Phone other	Emails and calls with cocounsel re: [REDACTED]	0.34	\$500.00	\$170.00
7/7/2022	SKR	Discovery Preparation	Calls and email with cocounsel re:[REDACTED]	0.29	\$500.00	\$145.00
7/7/2022	SKR	Discovery Preparation	Review Rule 26f report and emails re: same	0.34	\$500.00	\$170.00
7/7/2022	SKR	Discovery Preparation	Review initial disclosures	0.12	\$500.00	\$60.00
7/8/2022	SKR	Discovery Preparation	Calls and emails re: Rule 26f report and initial disclosures	0.29	\$500.00	\$145.00
7/11/2022	SKR	Correspondence	ECF notices re: filings and email re: same	0.05	\$500.00	\$25.00
7/11/2022	SKR	Phone other	Call and emails with counsel re: [REDACTED]	0.12	\$500.00	\$60.00
7/15/2022	SKR	Phone other	Call and emails with cocounsel and client re: [REDACTED]	0.53	\$500.00	\$265.00
7/19/2022	SKR	Correspondence	Emails and calls with cocounsel re: [REDACTED]	0.16	\$500.00	\$80.00
7/20/2022	SKR	Phone other	Call with cocounsel re: [REDACTED]	0.29	\$500.00	\$145.00
7/21/2022	SKR	Phone other	Call and emails with cocounsel re: [REDACTED]	0.16	\$500.00	\$80.00
7/25/2022	SKR	Meeting	Meetings and emails with cocounsel re: [REDACTED]	0.39	\$500.00	\$195.00
7/26/2022	SKR	Meeting	Meeting with SLS and email with counsel re: [REDACTED]	0.17	\$500.00	\$85.00
7/27/2022	SKR	Phone other	Call with SLS re: [REDACTED]	0.12	\$500.00	\$60.00

7/31/2022	SKR	Correspondence	Email re: status and review file re: agreement	0.17	\$500.00	\$85.00
8/1/2022	SKR	Phone other	Call with SLS and email with cocounsel re: [REDACTED]	0.21	\$500.00	\$105.00
8/2/2022	SKR	Phone other	Call with cocounsel re: [REDACTED]	0.24	\$500.00	\$120.00
8/9/2022	SKR	Phone other	Call with appellate counsel and SLS re: [REDACTED]; email from SLS re:[REDACTED]	0.25	\$500.00	\$125.00
8/9/2022	SKR	Phone other	Call with cocounsel re: [REDACTED]; meet with SLS re: [REDACTED]	0.61	\$500.00	\$305.00
8/11/2022	SKR	Correspondence	Email and call re: [REDACTED] with cocounsel	0.10	\$500.00	\$50.00
8/15/2022	SKR	Meeting	Meet with SLS re: [REDACTED]	0.09	\$500.00	\$45.00
8/16/2022	SKR	Phone other	Call, email and meeting with cocounsel re: [REDACTED]	0.25	\$500.00	\$125.00
8/17/2022	SKR	Phone other	Emails and call re: [REDACTED] with cocounsel	0.32	\$500.00	\$160.00
8/18/2022	SKR	Correspondence	Email with cocounsel re: [REDACTED] and emails re: [REDACTED]	0.19	\$500.00	\$95.00
8/19/2022	SKR	Review	Calls and emails with cocounsel re; [REDACTED]; review same	1.15	\$500.00	\$575.00
8/21/2022	SKR	Correspondence	Emails re: status	0.08	\$500.00	\$40.00
8/22/2022	SKR	Phone other	Call and emails re: [REDACTED]; meet with SLS re: [REDACTED]	0.21	\$500.00	\$105.00
8/23/2022	SKR	Correspondence	Emails and meeting with cocounsel re: [REDACTED]	0.23	\$500.00	\$115.00
8/24/2022	SKR	Phone other	Calls, emails and meeting re: [REDACTED]	0.28	\$500.00	\$140.00
8/26/2022	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.98	\$500.00	\$490.00
8/26/2022	SKR	Correspondence	Call with SAS and emails re: [REDACTED]	0.10	\$500.00	\$50.00
8/30/2022	SKR	Preparation	Call with SAS and preparation for conference call and issues for same; emails re: same	0.17	\$500.00	\$85.00
8/31/2022	SKR	Phone call from client	Calls and emails with cocounsel re: [REDACTED]	0.73	\$500.00	\$365.00

9/2/2022	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.88	\$500.00	\$440.00
9/9/2022	SKR	Phone other	Call and email with SLS and email from client re: [REDACTED]	0.12	\$500.00	\$60.00
9/13/2022	SKR	Correspondence	Emails and call re: [REDACTED]	0.24	\$500.00	\$120.00
9/14/2022	SKR	Phone other	Call and email re: [REDACTED] with counsel	0.28	\$500.00	\$140.00
9/19/2022	SKR	Phone other	Call and meet with SLS re: [REDACTED]	0.09	\$500.00	\$45.00
9/19/2022	SKR	Phone other	Calls and meet with cocounsel re: [REDACTED]	0.42	\$500.00	\$210.00
9/20/2022	SKR	Phone other	Calls with SLS re: [REDACTED] and emails re: [REDACTED]	0.63	\$500.00	\$315.00
9/21/2022	SKR	Phone other	Communications with counsel and staff re: [REDACTED] re: [REDACTED]	0.13	\$500.00	\$65.00
9/22/2022	SKR	Preparation	Preparation of settlement documents-calls and emails re: same	0.86	\$500.00	\$430.00
9/23/2022	SKR	Preparation	Calls and emails re: preparation of settlement agreement	0.35	\$500.00	\$175.00
9/26/2022	SKR	Preparation	Emails, meeting and calls re: status and municipal court issue; review settlement agreement	0.82	\$500.00	\$410.00
9/28/2022	SKR	Correspondence	Email re: [REDACTED] from cocounsel to client; call with SLS re: [REDACTED]	0.12	\$500.00	\$60.00
10/2/2022	SKR	Correspondence	Email re: conference with Court	0.04	\$500.00	\$20.00
10/3/2022	SKR	Meeting	Meeting with SLS re: [REDACTED]; email with RPS re: same	0.08	\$500.00	\$40.00
10/5/2022	SKR	Conference with client	Conference with cocounsel re: [REDACTED] re: same	0.26	\$500.00	\$130.00
10/6/2022	SKR	Phone other	Call with SLS re: [REDACTED] and email re: same	0.11	\$500.00	\$55.00
10/10/2022	SKR	Phone other	Call with SLS re: [REDACTED]	0.16	\$500.00	\$80.00
10/12/2022	SKR	Correspondence	Emails and call with cocounsel re: [REDACTED]	0.15	\$500.00	\$75.00
10/14/2022	SKR	Phone other	Review settlement agreement revisions and calls and emails with client and counsel re: [REDACTED]	0.47	\$500.00	\$235.00

10/14/2022	SKR	Correspondence	Email and call re: [REDACTED] with cocounsel; review file and Court orders	0.38	\$500.00	\$190.00
10/15/2022	SKR	Legal Research	Legal Research re: [REDACTED]	0.38	\$500.00	\$190.00
10/17/2022	SKR	Phone other	Calls with SLS re: [REDACTED]	0.18	\$500.00	\$90.00
10/17/2022	SKR	Correspondence	Email and call re: [REDACTED] with cocounsel	0.24	\$500.00	\$120.00
10/19/2022	SKR	Review	Review file in preparation of meeting with RPS re: [REDACTED] and call with SLS re: same	0.11	\$500.00	\$55.00
10/19/2022	SKR	Phone other	Call with SLS re: [REDACTED]	0.23	\$500.00	\$115.00
10/19/2022	SKR	Phone other	Call with cocounsel re: [REDACTED]	0.12	\$500.00	\$60.00
10/20/2022	SKR	Review	Review settlement agreement	0.31	\$500.00	\$155.00
10/24/2022	SKR	Preparation	Preparation of settlement agreement and emails and calls re: same	0.56	\$500.00	\$280.00
10/25/2022	SKR	Phone other	Call and emails with cocounsel re: [REDACTED]	0.34	\$500.00	\$170.00
10/26/2022	SKR	Preparation	Preparation of settlement agreement and emails and calls re: same; review agreement	0.53	\$500.00	\$265.00
10/27/2022	SKR	Phone other	Call and emails re: settlement agreement	0.25	\$500.00	\$125.00
11/1/2022	SKR	Phone other	Call and email with SLS re: [REDACTED]; meet with RPS re: same	0.26	\$500.00	\$130.00
11/2/2022	SKR	Correspondence	Emails re: [REDACTED] and calls with SLS re: same and [REDACTED] email	0.23	\$500.00	\$115.00
11/3/2022	SKR	Meeting	Meet with SAS re: [REDACTED]	0.09	\$500.00	\$45.00
11/4/2022	SKR	Correspondence	Email and call with cocounsel re: [REDACTED]	0.07	\$500.00	\$35.00
11/7/2022	SKR	Correspondence	Emails with counsel re: [REDACTED]	0.11	\$500.00	\$55.00
11/8/2022	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.86	\$500.00	\$430.00
11/9/2022	SKR	Preparation	Preparation of settlement agreement and related issues; emails and call re: [REDACTED] with cocounsel	0.24	\$500.00	\$120.00
11/10/2022	SKR	Phone other	Calls with cocounsel re: [REDACTED]	0.13	\$500.00	\$65.00

11/16/2022	SKR	Preparation	Preparation of settlement agreement-meeting and emails re: [REDACTED] with cocounsel	0.09	\$500.00	\$45.00
11/21/2022	SKR	Phone other	Call with SLS re: [REDACTED] and emails re: same	0.32	\$500.00	\$160.00
11/28/2022	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.59	\$500.00	\$295.00
11/30/2022	SKR	Phone other	Calls and emails with cocounsel re: [REDACTED]	0.45	\$500.00	\$225.00
Subtotal				96.76		\$48,380.00

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

DECLARATION OF SAMUEL L. SPEED

DECLARATION OF SAMUEL L. SPEED

Samuel L. Speed declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Storzer & Associates, P.C. at 9433 Common Brook Road, Owings Mills, Maryland 21117, attorneys for the Plaintiffs, and am duly admitted to practice law in the States of Kansas and Maryland.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendant.
3. This Declaration is based on my own personal knowledge.
4. I am a graduate of The George Washington University and the Washburn University School of Law.
5. I was admitted to practice law in the State of Kansas in 2003 and the State of Maryland in 2023.
6. I have been employed by Storzer & Associates, P.C. since May 2022 working in the statutory and constitutional religious freedom litigation field exclusively for the firm.

Prior to joining Storzer and Associates, I worked as a legal consultant in the cross-border litigation and transactions department of the Yingke Law Firm in Guangzhou, P.R. China for five years. Prior to moving to China, I was an assistant attorney general for the State of Kansas, responsible for interstate water disputes, and worked in private practice in litigation and transactional law.

7. My services in this litigation were billed out at \$500.00 per hour.
8. Throughout my work on this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of these records. It reflects 166.34 hours of billable attorney time I spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023.

/s/ Samuel L. Speed
Samuel L. Speed

DECLARATION OF SAMUEL L. SPEED
EXHIBIT A

Timekeeper:	Samuel L. Speed	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
5/31/2022	SLS	Preparation	Strategy discussion	0.20	\$500.00	\$100.00
5/31/2022	SLS	Preparation	Strategy discussion	0.20	\$500.00	\$100.00
5/31/2022	SLS	Legal Research	[REDACTED]	0.40	\$500.00	\$200.00
6/1/2022	SLS	Legal Research	[REDACTED]	1.60	\$500.00	\$800.00
6/2/2022	SLS	Correspondence	Letter to client re: [REDACTED]	0.30	\$500.00	\$150.00
6/3/2022	SLS	Legal Research	[REDACTED]	2.60	\$500.00	\$1,300.00
6/6/2022	SLS	Preparation	Phone conference preparation	0.39	\$500.00	\$195.00
6/7/2022	SLS	Draft Documents	Review Defendant's settlement agreement and response	0.86	\$500.00	\$430.00
6/7/2022	SLS	Phone call from client	Discussion re: [REDACTED]	0.10	\$500.00	\$50.00
6/7/2022	SLS	Meeting	Legal team discussion regarding [REDACTED]	0.38	\$500.00	\$190.00
6/8/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.33	\$500.00	\$165.00
6/8/2022	SLS	Draft Documents	Settlement agreement	2.57	\$500.00	\$1,285.00
6/9/2022	SLS	Draft Documents	06/06/2022 Settlement Agreement; edit and review	0.60	\$500.00	\$300.00
6/10/2022	SLS	Phone other	Co-counsel call [REDACTED]	0.05	\$500.00	\$25.00
6/10/2022	SLS	Draft Documents	Affidavit preparation and review	0.32	\$500.00	\$160.00
6/10/2022	SLS	Draft Documents	Rule 68 Settlement Agreement	0.80	\$500.00	\$400.00
6/13/2022	SLS	Legal Research	[REDACTED]	1.05	\$500.00	\$525.00
6/13/2022	SLS	Legal Research	[REDACTED]	1.83	\$500.00	\$915.00
6/16/2022	SLS	Legal Research	[REDACTED]	0.60	\$500.00	\$300.00
6/20/2022	SLS	Legal Research	[REDACTED]	1.48	\$500.00	\$740.00
6/20/2022	SLS	Draft Documents	Rule 68 Offer; Settlement Agreement; Developer Agreement	1.48	\$500.00	\$740.00
6/20/2022	SLS	Meeting	Local counsel discussion	0.33	\$500.00	\$165.00
6/21/2022	SLS	Legal Research	Settlement agreement; motion to dismiss; attorney's fees	0.50	\$500.00	\$250.00
6/21/2022	SLS	Draft Documents	[REDACTED]	2.12	\$500.00	\$1,060.00
6/21/2022	SLS	Draft Documents	Motion for Attorney's fees; 42 USC 1988	2.23	\$500.00	\$1,115.00

6/21/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.46	\$500.00	\$230.00
6/22/2022	SLS	Draft Documents	Settlement agreement and development agreement	0.21	\$500.00	\$105.00
6/23/2022	SLS	Draft Documents	Settlement agreement and attachments	3.41	\$500.00	\$1,705.00
6/24/2022	SLS	Legal Research	[REDACTED]	0.48	\$500.00	\$240.00
6/24/2022	SLS	Draft Documents	Settlement Agreement; Development Agreement	2.35	\$500.00	\$1,175.00
6/27/2022	SLS	Phone call from client	Call with client re: [REDACTED]	0.07	\$500.00	\$35.00
6/27/2022	SLS	Draft Documents	Motion for Attorney's fees	0.26	\$500.00	\$130.00
6/27/2022	SLS	Draft Documents	Settlement agreement	1.19	\$500.00	\$595.00
6/28/2022	SLS	Draft Documents	Settlement Agreement	1.00	\$500.00	\$500.00
6/28/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.94	\$500.00	\$470.00
6/28/2022	SLS	Draft Documents	Settlement Agreement	2.44	\$500.00	\$1,220.00
7/5/2022	SLS	Discovery Preparation	Plan CMC conference	2.47	\$500.00	\$1,235.00
7/6/2022	SLS	Discovery Preparation	Initial Disclosures	1.63	\$500.00	\$815.00
7/7/2022	SLS	Correspondence	Email to co-counsel regarding [REDACTED]	0.40	\$500.00	\$200.00
7/7/2022	SLS	Discovery Preparation	26(f) form	1.95	\$500.00	\$975.00
7/7/2022	SLS	Discovery Preparation	Initial Disclosures	2.11	\$500.00	\$1,055.00
7/7/2022	SLS	Discovery Preparation	26(f) form	2.20	\$500.00	\$1,100.00
7/8/2022	SLS	Discovery Preparation	26(f) report revisions and preparation	0.81	\$500.00	\$405.00
7/8/2022	SLS	Discovery Preparation	Prepare 26(a) Initial Disclosures	3.80	\$500.00	\$1,900.00
7/8/2022	SLS	Draft Documents	Continuance Rule 68 and CMC conference.	0.14	\$500.00	\$70.00
7/11/2022	SLS	Phone other	Contact local counsel [REDACTED]	0.24	\$500.00	\$120.00
7/12/0202	SLS	Draft Documents	Initial Disclosures	0.33	\$500.00	\$165.00
7/12/0202	SLS	Preparation	July 21, 2021 Status Conference ; Attendees ; Agenda	1.02	\$500.00	\$510.00
7/15/2022	SLS	Other	Contact local counsel regarding [REDACTED]	0.36	\$500.00	\$180.00
7/15/2022	SLS	Phone call from client	Discuss [REDACTED] with client and S. Rath	0.36	\$500.00	\$180.00
7/15/2022	SLS	Conference with client	Analyze and discuss defendant's position regarding [REDACTED] with SKR and EWT	0.63	\$500.00	\$315.00

7/18/2022	SLS	Phone other	Contact local counsel regarding [REDACTED]	0.06	\$500.00	\$30.00
7/19/2022	SLS	Other	Discuss strategy for Agreement Schedule E and Status Conference	0.19	\$500.00	\$95.00
7/19/2022	SLS	Other	Phone call with local counsel J. Slagter regarding [REDACTED]	0.30	\$500.00	\$150.00
7/20/2020	SLS	Preparation	07/21 Status Conference / Confirm dates, local rules, Judge's standing order	0.56	\$500.00	\$280.00
7/20/2020	SLS	Meeting	Meeting with local counsel to discuss [REDACTED]	0.60	\$500.00	\$300.00
7/21/2022	SLS	Court Appearance	Status conference with Judge Calabrese	0.50	\$500.00	\$250.00
7/21/2022	SLS	Preparation	Status conference with court / Review docket and current orders	0.57	\$500.00	\$285.00
7/21/2022	SLS	Draft Documents	Note to the file - 07/21 Status Conference with Court	0.75	\$500.00	\$375.00
7/21/2022	SLS	Phone call from client	[REDACTED]	0.10	\$500.00	\$50.00
7/22/2022	SLS	Review	Analyze case file regarding defendant's decision not to extend Rule 68 offer of judgment	0.58	\$500.00	\$290.00
7/25/2022	SLS	Correspondence	Update file and counsel regarding extension of Rule 68 Offer	0.13	\$500.00	\$65.00
7/25/2022	SLS	Phone call with opposing Attorney	Telephone call with M. Landes regarding extension of Rule 68 offer of judgment	0.22	\$500.00	\$110.00
7/25/2022	SLS	Preparation	Preparation for client meeting on Tuesday, July 26, 2022 - Discuss [REDACTED]	0.33	\$500.00	\$165.00
7/25/2022	SLS	Phone other	Phone local counsel regarding [REDACTED]	0.37	\$500.00	\$185.00
7/25/2022	SLS	Draft Documents	Prepare client communication regarding [REDACTED]	1.38	\$500.00	\$690.00
7/25/2022	SLS	Legal Research	[REDACTED]	3.60	\$500.00	\$1,800.00
7/26/2022	SLS	Legal Research	[REDACTED]	0.66	\$500.00	\$330.00
7/26/2022	SLS	Legal Research	[REDACTED]	1.04	\$500.00	\$520.00
7/26/2022	SLS	Legal Research	[REDACTED]	1.17	\$500.00	\$585.00

7/26/2022	SLS	Legal Research	[REDACTED]	1.71	\$500.00	\$855.00
7/26/2022	SLS	Other	Update notes to the file regarding proposed extension agreement from L McConnville and next steps	0.54	\$500.00	\$270.00
7/27/2022	SLS	Correspondence	Update client on [REDACTED]	0.38	\$500.00	\$190.00
7/27/2022	SLS	Legal Research	[REDACTED]	0.50	\$500.00	\$250.00
7/27/2022	SLS	Legal Research	[REDACTED]	2.04	\$500.00	\$1,020.00
7/28/2022	SLS	Legal Research	Review zoning regulations and court decisions for special use permits and court decrees	1.99	\$500.00	\$995.00
8/3/2022	SLS	Phone other	Contact local counsel regarding [REDACTED]	0.08	\$500.00	\$40.00
8/4/2022	SLS	Phone call from client	[REDACTED]	0.20	\$500.00	\$100.00
8/8/2022	SLS	Phone other	Discussion with co-counsel regarding [REDACTED]	0.10	\$500.00	\$50.00
8/9/2022	SLS	Conference with client	Discuss legal strategy with counsel regarding [REDACTED]	1.12	\$500.00	\$560.00
8/10/2022	SLS	Phone other	Contact local counsel regarding [REDACTED] and note legal analysis in the file	0.34	\$500.00	\$170.00
8/11/2022	SLS	Phone call from client	Phone call from client	0.18	\$500.00	\$90.00
8/12/2022	SLS	Legal Research	[REDACTED]	0.24	\$500.00	\$120.00
8/17/2022	SLS	Review	Review and analyze communications from client	0.54	\$500.00	\$270.00
8/18/2022	SLS	Review	Review City's 08182022 Draft Agreement	0.46	\$500.00	\$230.00
8/18/2022	SLS	Phone call from client	Discussion with client	0.10	\$500.00	\$50.00
8/19/2022	SLS	Review	Review case file to prepare to restart litigation	1.05	\$500.00	\$525.00
8/19/2022	SLS	Review	Review City's 08192022 draft agreement	1.09	\$500.00	\$545.00
8/19/2022	SLS	Review	Review case file to restart litigation	1.28	\$500.00	\$640.00
8/19/2022	SLS	Phone other	Discussion with counsel regarding [REDACTED]	0.20	\$500.00	\$100.00
8/23/2022	SLS	Other	Review case file and local litigation filings for University Heights, OH	0.19	\$500.00	\$95.00

8/26/2022	SLS	Research	Review University Heights Council Meetings	0.51	\$500.00	\$255.00
8/26/2022	SLS	Review	Review University Heights meetings and approved ordinances	0.62	\$500.00	\$310.00
8/31/2022	SLS	Phone call from client	Phone call from client	0.82	\$500.00	\$410.00
8/31/2022	SLS	Correspondence	Email to client	0.86	\$500.00	\$430.00
9/1/2022	SLS	Phone other	Contact co-counsel regarding [REDACTED]	0.10	\$500.00	\$50.00
9/2/2022	SLS	Draft Documents	Email to co-counsel re: [REDACTED]	0.29	\$500.00	\$145.00
9/2/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.30	\$500.00	\$150.00
9/6/2022	SLS	Draft Documents	Rule 68 extension	0.22	\$500.00	\$110.00
9/7/2022	SLS	Phone call from client	[REDACTED]	0.30	\$500.00	\$150.00
9/9/2022	SLS	Document Review	Review and analyze recently filed civil rights case against City and Mayor Brennan	1.73	\$500.00	\$865.00
9/13/2022	SLS	Correspondence	Letter to client re: [REDACTED]	0.69	\$500.00	\$345.00
9/14/2022	SLS	Document Review	Analyze case file for litigation or settlement options	0.68	\$500.00	\$340.00
9/16/2022	SLS	Phone call from client	Client discussion re: [REDACTED]	0.23	\$500.00	\$115.00
9/19/2023	SLS	Preparation	Review and analyze state court claims and strategy for CMC conference	0.32	\$500.00	\$160.00
9/20/2022	SLS	Legal Research	[REDACTED]	0.82	\$500.00	\$410.00
9/20/2022	SLS	Review	Analyze City's amendments to agreement and determine next steps	2.82	\$500.00	\$1,410.00
9/21/2022	SLS	Phone call from client	Phone call with client re: [REDACTED]	0.41	\$500.00	\$205.00
9/21/2022	SLS	Draft Documents	Draft Settlement Agreement	0.98	\$500.00	\$490.00
9/21/2022	SLS	Preparation	Review and analyze plaintiff's litigation options and current offer of settlement.	1.44	\$500.00	\$720.00
9/22/2022	SLS	Draft Documents	Settlement Agreement	1.77	\$500.00	\$885.00
9/23/2022	SLS	Draft Documents	Review and revise settlement agreement	3.39	\$500.00	\$1,695.00
9/26/2022	SLS	Draft Documents	Settlement Agreement	2.04	\$500.00	\$1,020.00
9/27/2022	SLS	Draft Documents	Review and edit draft settlement agreement	1.38	\$500.00	\$690.00
9/28/2022	SLS	Correspondence	Email to client re: [REDACTED]	0.17	\$500.00	\$85.00

9/28/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.22	\$500.00	\$110.00
9/29/2022	SLS	Correspondence	Email to co-counsel re: [REDACTED]	0.35	\$500.00	\$175.00
10/4/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	1.59	\$500.00	\$795.00
10/5/2022	SLS	Preparation	Preparation for status conference with Court	0.22	\$500.00	\$110.00
10/5/2022	SLS	Court Appearance	Status conference with Court	0.30	\$500.00	\$150.00
10/5/2022	SLS	Legal Research	[REDACTED]	0.55	\$500.00	\$275.00
10/6/2022	SLS	Draft Documents	Discovery documents	0.53	\$500.00	\$265.00
10/10/2022	SLS	Legal Research	[REDACTED]	0.64	\$500.00	\$320.00
10/12/2022	SLS	Correspondence	Email to co-counsel	0.49	\$500.00	\$245.00
10/13/2022	SLS	Legal Research	[REDACTED]	1.06	\$500.00	\$530.00
10/14/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.29	\$500.00	\$145.00
10/14/2022	SLS	Review	Review City's Settlement Agreement draft sent 10/14/2022	0.81	\$500.00	\$405.00
10/14/2022	SLS	Legal Research	[REDACTED]	2.08	\$500.00	\$1,040.00
10/14/2022	SLS	Phone other	Confer with co-counsel re: settlement status	0.26	\$500.00	\$130.00
10/17/2022	SLS	Legal Research	[REDACTED]	1.55	\$500.00	\$775.00
10/17/2022	SLS	Draft Documents	Settlement Memo regarding City's Settlement Agreement	2.61	\$500.00	\$1,305.00
10/18/2022	SLS	Court Appearance for Hearing	Court Appearance for Status Conference	0.34	\$500.00	\$170.00
10/18/2022	SLS	Draft Documents	Settlement Agreement	0.98	\$500.00	\$490.00
10/18/2022	SLS	Draft Documents	Motion for Attorney's Fees	1.41	\$500.00	\$705.00
10/19/2022	SLS	Preparation	Meeting with client regarding [REDACTED]	0.20	\$500.00	\$100.00
10/19/2022	SLS	Draft Documents	Motion for Attorney's Fees	3.05	\$500.00	\$1,525.00
10/19/2022	SLS	Conference with client	Discussion with SKR regarding [REDACTED]	0.26	\$500.00	\$130.00
10/19/2022	SLS	Draft Documents	Settlement Agreement	2.29	\$500.00	\$1,145.00
10/19/2022	SLS	Phone call from client	Phone discussion with client and J Slagter, L Sacher, SKR regarding [REDACTED]	0.48	\$500.00	\$240.00
10/20/2022	SLS	Phone call from client	Contact client regarding [REDACTED]	0.22	\$500.00	\$110.00
10/20/2022	SLS	Legal Research	[REDACTED]	1.13	\$500.00	\$565.00

10/20/2022	SLS	Draft Documents	Motion for Attorney's Fees	2.08	\$500.00	\$1,040.00
10/21/2022	SLS	Draft Documents	Settlement Agreement	1.27	\$500.00	\$635.00
10/22/2022	SLS	Draft Documents	Settlement Agreement	0.72	\$500.00	\$360.00
10/24/2022	SLS	Legal Research	[REDACTED]	0.35	\$500.00	\$175.00
10/24/2022	SLS	Correspondence	Emails from co-counsel regarding [REDACTED]	0.83	\$500.00	\$415.00
10/24/2022	SLS	Draft Documents	Settlement Agreement	1.80	\$500.00	\$900.00
10/25/2022	SLS	Draft Documents	Settlement Agreement	2.37	\$500.00	\$1,185.00
10/25/2022	SLS	Legal Research	[REDACTED]	0.69	\$500.00	\$345.00
10/26/2022	SLS	Draft Documents	Settlement Agreement	1.37	\$500.00	\$685.00
10/26/2022	SLS	Draft Documents	Settlement Agreement	1.94	\$500.00	\$970.00
10/27/2022	SLS	Draft Documents	Settlement Agreement	0.20	\$500.00	\$100.00
10/27/2022	SLS	Legal Research	[REDACTED]	0.93	\$500.00	\$465.00
10/27/2022	SLS	Draft Documents	Settlement Agreement	1.11	\$500.00	\$555.00
10/27/2022	SLS	Legal Research	[REDACTED]	2.60	\$500.00	\$1,300.00
10/27/2022	SLS	Phone call from client	[REDACTED]	0.10	\$500.00	\$50.00
10/28/2022	SLS	Draft Documents	Attorney's fees Argument	2.01	\$500.00	\$1,005.00
11/1/2022	SLS	Draft Documents	Settlement agreement	0.65	\$500.00	\$325.00
11/1/2022	SLS	Review	Review and analyze current version of settlement agreement for client review	1.62	\$500.00	\$810.00
11/2/2022	SLS	Correspondence	Read emails, review issues, and coordinate attendance for court ordered status conference of November 3, 2022	0.17	\$500.00	\$85.00
11/2/2022	SLS	Phone call from client	Phone call from client re: [REDACTED]	0.28	\$500.00	\$140.00
11/3/2022	SLS	Court Appearance	Court Appearance - Status Conference	0.33	\$500.00	\$165.00
11/4/2022	SLS	Phone call with opposing Attorney	Zoom Call with Defense Counsel	0.42	\$500.00	\$210.00
11/4/2022	SLS	Preparation	Settlement Discussions with Defense counsel	0.59	\$500.00	\$295.00
11/4/2022	SLS	Legal Research	[REDACTED]	2.33	\$500.00	\$1,165.00
11/8/2022	SLS	Correspondence	Email to co-counsel regarding [REDACTED]	0.10	\$500.00	\$50.00
11/8/2022	SLS	Review	Review Defendant's draft settlement agreement	0.43	\$500.00	\$215.00
11/8/2022	SLS	Correspondence	Email to client regarding [REDACTED]	1.31	\$500.00	\$655.00

11/9/2022	SLS	Conference with client	Conference co counsel regarding [REDACTED]	0.06	\$500.00	\$30.00
11/9/2022	SLS	Phone call from client	Phone call from client regarding [REDACTED]	0.14	\$500.00	\$70.00
11/10/2022	SLS	Conference with client	Conference with client regarding [REDACTED]	0.32	\$500.00	\$160.00
11/15/2022	SLS	Correspondence	Email to local counsel regarding [REDACTED]	0.53	\$500.00	\$265.00
11/21/2022	SLS	Correspondence	Email to co-counsel regarding [REDACTED]	0.21	\$500.00	\$105.00
11/22/2022	SLS	Court Appearance	Court Appearance - Status Conference	0.35	\$500.00	\$175.00
11/22/2022	SLS	Correspondence	Email to co-counsel regarding [REDACTED]	0.67	\$500.00	\$335.00
11/25/2022	SLS	Correspondence	Email to case team regarding [REDACTED]	0.73	\$500.00	\$365.00
11/28/2022	SLS	Conference with client	Conference with co counsel regarding [REDACTED]	0.15	\$500.00	\$75.00
11/30/2022	SLS	Correspondence	Email to co-counsel regarding [REDACTED]	0.36	\$500.00	\$180.00
12/1/2022	SLS	Phone other	Call with co counsel	0.05	\$500.00	\$25.00
12/1/2022	SLS	Draft Documents	Settlement Agreement protocol	0.36	\$500.00	\$180.00
12/2/2022	SLS	Draft Documents	Settlement procedures	2.18	\$500.00	\$1,090.00
12/6/2022	SLS	Review	Settlement procedures and proposed timeline	0.08	\$500.00	\$40.00
12/6/2022	SLS	Legal Research	[REDACTED]	1.94	\$500.00	\$970.00
12/6/2022	SLS	Preparation	Preparation	0.11	\$500.00	\$55.00
12/6/2022	SLS	Draft Documents	Settlement procedures	0.30	\$500.00	\$150.00
12/6/2022	SLS	Conference with client	Phone call with local counsel regarding [REDACTED]	0.21	\$500.00	\$105.00
12/7/2022	SLS	Draft Documents	Draft settlement agreement and settlement procedures	0.17	\$500.00	\$85.00
Subtotal				166.34		\$83,170.00

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

**DECLARATION OF JONATHAN
S. GROSS**

DECLARATION OF JONATHAN S. GROSS

Jonathan S. Gross declares as follows, pursuant to 28 U.S.C. § 1746:

1. I was an associate at Storzer & Associates, P.C., 9433 Common Brook Road, Owings Mills, Maryland 21117, attorneys for the Plaintiffs, from the time period of April 19, 2021 to June 1, 2022.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendant.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in the State of Maryland in 2019.
5. I graduated from the University of Baltimore School of Law in 2019.
6. My services for Storzer & Associates, P.C. were billed out at \$500.00 per hour for this litigation.

7. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of my contemporaneous time records of legal services performed in this matter. It reflects 193.27 hours of billable attorney time spent on this matter.
8. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023

/s/ Jonathan S. Gross
Jonathan S. Gross

DECLARATION OF JONATHAN S. GROSS
EXHIBIT A

Timekeeper:	Jonathan S. Gross	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (Calculated)
8/3/2021	JSG	Meeting	Meeting with client about [REDACTED]	0.22	\$500.00	\$110.00
8/9/2021	JSG	Meeting	Meeting discussion with local counsel about [REDACTED]	0.07	\$500.00	\$35.00
8/10/2021	JSG	Meeting	Meeting with client about [REDACTED]	0.52	\$500.00	\$260.00
8/12/2021	JSG	Review	Review application from architect.	0.04	\$500.00	\$20.00
8/12/2021	JSG	Phone call from client	Phone call with client discussing [REDACTED]	0.08	\$500.00	\$40.00
8/17/2021	JSG	Draft Documents	Draft proof outline for federal complaint.	3.42	\$500.00	\$1,710.00
8/18/2021	JSG	Draft Documents	Draft proof outline	1.59	\$500.00	\$795.00
8/20/2021	JSG	Draft Documents	Draft federal complaint	0.24	\$500.00	\$120.00
8/20/2021	JSG	Discovery Preparation	Spoke with planning expert	0.51	\$500.00	\$255.00
8/20/2021	JSG	Draft Documents	Draft email to planning expert with [REDACTED]	1.19	\$500.00	\$595.00
8/26/2021	JSG	Draft Documents	Draft federal complaint	0.97	\$500.00	\$485.00
9/6/2021	JSG	Draft Documents	Draft federal complaint	0.92	\$500.00	\$460.00
9/9/2021	JSG	Phone other	Local counsel about [REDACTED]	0.22	\$500.00	\$110.00
9/9/2021	JSG	Draft Documents	Meeting with EWT about [REDACTED] for Federal complaint.	0.37	\$500.00	\$185.00
9/9/2021	JSG	Meeting	Meeting with client and local counsel and RP and SKG about [REDACTED]	0.64	\$500.00	\$320.00
9/10/2021	JSG	Draft Documents	Draft federal complaint.	3.25	\$500.00	\$1,625.00
9/10/2021	JSG	Meeting	Meeting: discussion with client and SKR about [REDACTED]	0.22	\$500.00	\$110.00
9/10/2021	JSG	Review	Reviewed September City council meeting.	0.25	\$500.00	\$125.00
9/12/2021	JSG	Draft Documents	Draft federal complaint	4.85	\$500.00	\$2,425.00
9/13/2021	JSG	Draft Documents	Draft: Resolve EWT's comments on Federal complaint	0.90	\$500.00	\$450.00
9/13/2021	JSG	Draft Documents	Draft: incorporate [REDACTED]	4.25	\$500.00	\$2,125.00
9/13/2021	JSG	Phone other	Spoke with planning expert about [REDACTED]	0.25	\$500.00	\$125.00

9/14/2021	JSG	Research	Researched [REDACTED]	0.32	\$500.00	\$160.00
9/14/2021	JSG	Meeting	Meeting with planning expert	0.20	\$500.00	\$100.00
9/14/2021	JSG	Review	Reviewed [REDACTED] for meeting with expert.	0.50	\$500.00	\$250.00
9/14/2021	JSG	Draft Documents	Draft federal complaint	3.22	\$500.00	\$1,610.00
9/15/2021	JSG	Draft Documents	Draft federal complaint	4.77	\$500.00	\$2,385.00
9/17/2021	JSG	Review	Review expert analysis of City	0.19	\$500.00	\$95.00
9/17/2021	JSG	Draft Documents	Draft federal complaint	4.54	\$500.00	\$2,270.00
9/26/2021	JSG	Draft Documents	Draft federal complaint	2.62	\$500.00	\$1,310.00
9/26/2021	JSG	Meeting	Meeting with client and RPS and local counsel about [REDACTED]	0.25	\$500.00	\$125.00
9/26/2021	JSG	Meeting	Strategy meeting with local counsel about [REDACTED]	0.45	\$500.00	\$225.00
9/27/2021	JSG	Draft Documents	Draft federal complaint	4.93	\$500.00	\$2,465.00
10/4/2021	JSG	Preparation of pleadings	Preparation of pleadings: finalized PHV motions and sent to local counsel	0.16	\$500.00	\$80.00
10/4/2021	JSG	Correspondence	Email to local counsel about [REDACTED]	0.04	\$500.00	\$20.00
10/6/2021	JSG	Meeting	Meeting with local counsel about [REDACTED]	0.52	\$500.00	\$260.00
10/7/2021	JSG	Review	Review local counsel comments to federal complaint draft and final review before filing	1.78	\$500.00	\$890.00
10/8/2021	JSG	Draft Documents	Final review of federal complaint	0.09	\$500.00	\$45.00
10/8/2021	JSG	Draft Documents	Draft media statement	1.34	\$500.00	\$670.00
10/11/2021	JSG	Draft Documents	Final preparations for filing of federal complaint	4.35	\$500.00	\$2,175.00
10/13/2021	JSG	Review	Reviewed press release for	0.28	\$500.00	\$140.00
10/13/2021	JSG	Preparation of pleadings	Preparation of pleadings: prepared federal complaint for filing	0.69	\$500.00	\$345.00
10/14/2021	JSG	Correspondence	Email to local counsel about [REDACTED]	0.08	\$500.00	\$40.00
10/19/2021	JSG	Draft Documents	Added recent statements by Mayor to proof outline	0.45	\$500.00	\$225.00
10/21/2021	JSG	Meeting	Meeting with local counsel about [REDACTED]	0.34	\$500.00	\$170.00

10/21/2021	JSG	Draft Documents	Draft memo to client about [REDACTED]	0.41	\$500.00	\$205.00
10/22/2021	JSG	Draft Documents	Draft mediation statement	1.15	\$500.00	\$575.00
10/24/2021	JSG	Draft Documents	Draft mediation memo	1.96	\$500.00	\$980.00
10/25/2021	JSG	Draft Documents	Draft mediation memo	2.77	\$500.00	\$1,385.00
10/27/2021	JSG	Preparation	Prepared mediation objectives	0.48	\$500.00	\$240.00
10/27/2021	JSG	Draft Documents	Draft mediation memo	4.67	\$500.00	\$2,335.00
10/28/2021	JSG	Draft Documents	Draft mediation memo	2.42	\$500.00	\$1,210.00
10/28/2021	JSG	Preparation	Sent email to local counsel asking for [REDACTED]	0.02	\$500.00	\$10.00
10/29/2021	JSG	Draft Documents	Draft mediation memo	3.07	\$500.00	\$1,535.00
11/1/2021	JSG	Preparation	Preparation mediation objectives	0.25	\$500.00	\$125.00
11/1/2021	JSG	Draft Documents	Draft mediation statement	3.06	\$500.00	\$1,530.00
11/2/2021	JSG	Draft Documents	Draft mediation memo	1.74	\$500.00	\$870.00
11/3/2021	JSG	Draft Documents	Draft mediation memo	0.71	\$500.00	\$355.00
11/8/2021	JSG	Review	Review Defendants motion to dismiss or stay	0.11	\$500.00	\$55.00
11/8/2021	JSG	Meeting	Meeting with local counsel about [REDACTED]	0.12	\$500.00	\$60.00
11/8/2021	JSG	Phone call from client	Spoke to client about [REDACTED]	0.32	\$500.00	\$160.00
11/9/2021	JSG	Legal Research	Drafted memo for EWT [REDACTED]	0.15	\$500.00	\$75.00
11/9/2021	JSG	Draft Documents	Drafted consent order for stay in pending mediation	1.04	\$500.00	\$520.00
11/10/2021	JSG	Draft Documents	Draft stipulation to stay litigation in federal case	0.27	\$500.00	\$135.00
11/10/2021	JSG	Phone other	Call with local counsel about [REDACTED] and follow up email	0.56	\$500.00	\$280.00
11/10/2021	JSG	Draft Documents	Draft mediation statement	1.82	\$500.00	\$910.00
11/11/2021	JSG	Draft Documents	Draft mediation statement	3.38	\$500.00	\$1,690.00
11/16/2021	JSG	Meeting	Meeting with J. Slagter, client about [REDACTED]	1.20	\$500.00	\$600.00
11/16/2021	JSG	Draft Documents	Draft mediation statement	1.07	\$500.00	\$535.00
11/18/2021	JSG	Review	Review recording of 2019 commission hearing	0.49	\$500.00	\$245.00
11/19/2021	JSG	Draft Documents	Draft mediation statement	1.29	\$500.00	\$645.00

11/22/2021	JSG	Travel	Travel to Ohio for hearing (billed at 1/2 time)	3.25	\$500.00	\$1,625.00
11/22/2021	JSG	Court	Appearance for Hearing Hearing for SUP	4.00	\$500.00	\$2,000.00
11/23/2021	JSG	Travel	Travel to Ohio for SUP hearing (billed at 1/2 time)	2.75	\$500.00	\$1,375.00
11/25/2021	JSG	Draft Documents	Draft damages section of mediation memorandum	0.50	\$500.00	\$250.00
11/25/2021	JSG	Phone call from client	Phone call with client regarding [REDACTED]	1.13	\$500.00	\$565.00
11/29/2021	JSG	Draft Documents	Draft mediation statement	1.27	\$500.00	\$635.00
11/30/2021	JSG	Draft Documents	Draft mediation statement	5.25	\$500.00	\$2,625.00
12/2/2021	JSG	Preparation	Preparation for mediation	0.65	\$500.00	\$325.00
12/2/2021	JSG	Travel	Travel for mediation (billed at 1/2-time)	3.00	\$500.00	\$1,500.00
12/3/2021	JSG	Meeting	Mediation in Ohio	7.50	\$500.00	\$3,750.00
12/5/2021	JSG	Travel	Return trip from Ohio (billed at 1/2-time)	2.75	\$500.00	\$1,375.00
12/6/2021	JSG	Meeting	Meeting with client and local counsel	0.83	\$500.00	\$415.00
12/15/2021	JSG	Meeting	Meeting with mediator	0.60	\$500.00	\$300.00
12/16/2021	JSG	Meeting	Meeting with local counsel about [REDACTED]	0.25	\$500.00	\$125.00
12/16/2021	JSG	Draft Documents	Draft proposal for mediator	1.80	\$500.00	\$900.00
12/17/2021	JSG	Draft Documents	Draft proposal for mediator	4.75	\$500.00	\$2,375.00
12/20/2021	JSG	Draft Documents	Draft supplemental mediation statement	0.84	\$500.00	\$420.00
12/21/2021	JSG	Draft Documents	Draft mediation statement supplement	0.30	\$500.00	\$150.00
12/22/2021	JSG	Draft Documents	Draft mediation statement supplement	1.75	\$500.00	\$875.00
12/27/2021	JSG	Meeting	Meeting with counsel in Shaker Heights case regarding [REDACTED]	0.37	\$500.00	\$185.00
12/27/2021	JSG	Draft Documents	Draft supplemental mediation statement	1.17	\$500.00	\$585.00
12/28/2021	JSG	Draft Documents	Draft mediation supplement	0.24	\$500.00	\$120.00
12/28/2021	JSG	Review	Review amended temporary restraining order sent by opposing counsel	0.28	\$500.00	\$140.00
12/28/2021	JSG	Draft Documents	Prepared documents for renewal of pro hac vice, including getting form notarized	0.33	\$500.00	\$165.00

12/29/2021	JSG	Phone call from client	Phone call from members of control group regarding [REDACTED]	0.99	\$500.00	\$495.00
1/3/2022	JSG	Review	Review case status	0.36	\$500.00	\$180.00
1/7/2022	JSG	Phone other	Local counsel to coordinate status	0.32	\$500.00	\$160.00
1/11/2022	JSG	Draft Documents	Draft joint status report for federal case	0.73	\$500.00	\$365.00
1/12/2022	JSG	Review	Review case status	0.04	\$500.00	\$20.00
1/13/2022	JSG	Draft Documents	Draft joint status report for the federal court	0.09	\$500.00	\$45.00
1/14/2022	JSG	Review	Review email from local counsel regarding [REDACTED]	0.28	\$500.00	\$140.00
1/14/2022	JSG	Draft Documents	Draft status update for court in federal case	0.31	\$500.00	\$155.00
1/17/2022	JSG	Meeting	Conference call with control group about [REDACTED]	0.08	\$500.00	\$40.00
2/8/2022	JSG	Phone call from client	Phone call with local counsel regarding [REDACTED]	0.25	\$500.00	\$125.00
2/9/2022	JSG	Draft Documents	Draft joint status report	0.21	\$500.00	\$105.00
2/10/2022	JSG	Meeting	Meeting with local counsel about [REDACTED]	1.04	\$500.00	\$520.00
2/14/2022	JSG	Meeting	Meeting with mediator	0.46	\$500.00	\$230.00
2/23/2022	JSG	Draft Documents	Draft response to motion to dismiss	2.00	\$500.00	\$1,000.00
3/1/2022	JSG	Draft Documents	Draft opposition to motion to dismiss	0.50	\$500.00	\$250.00
3/3/2022	JSG	Meeting	Meeting with client regarding [REDACTED]	0.37	\$500.00	\$185.00
3/4/2022	JSG	Draft Documents	Draft response to mediator's proposal	0.81	\$500.00	\$405.00
3/7/2022	JSG	Correspondence	Contact mediator about extension for mediator's proposal	0.05	\$500.00	\$25.00
3/9/2022	JSG	Correspondence	Arranged with counsel and Court to continue to stay on litigation	0.42	\$500.00	\$210.00
3/23/2022	JSG	Meeting	Meeting with client SKR and local counsel about [REDACTED]	0.42	\$500.00	\$210.00
3/30/2022	JSG	Meeting	Meeting with opposing counsel SKR and J. Slagter about lifting stay on litigation	0.37	\$500.00	\$185.00
3/31/2022	JSG	Draft Documents	Draft response to motion to dismiss	4.55	\$500.00	\$2,275.00
4/3/2022	JSG	Draft Documents	Draft opposition to motion to dismiss	2.68	\$500.00	\$1,340.00

4/5/2022	JSG	Draft Documents	Draft response to motion to dismiss	2.59	\$500.00	\$1,295.00
4/6/2022	JSG	Research	Research rules regarding [REDACTED]	0.68	\$500.00	\$340.00
4/6/2022	JSG	Meeting	Meeting with SKR and local counsel to discuss [REDACTED]	0.45	\$500.00	\$225.00
4/11/2022	JSG	Draft Documents	Draft stipulation	0.20	\$500.00	\$100.00
4/14/2022	JSG	Draft Documents	Draft memorandum for upcoming court conference	0.21	\$500.00	\$105.00
4/14/2022	JSG	Meeting	Meeting with SKR regarding upcoming conferences	0.59	\$500.00	\$295.00
4/14/2022	JSG	Draft Documents	Draft discovery plan	1.35	\$500.00	\$675.00
4/15/2022	JSG	Meeting	Meeting with SKR to discuss [REDACTED]	1.17	\$500.00	\$585.00
4/18/2022	JSG	Discovery Preparation	Prepare discovery plan and initial disclosures	0.37	\$500.00	\$185.00
4/25/2022	JSG	Discovery Preparation	Draft initial disclosures	1.37	\$500.00	\$685.00
4/26/2022	JSG	Draft Documents	Draft initial disclosures	1.41	\$500.00	\$705.00
4/26/2022	JSG	Draft Documents	Draft discovery schedule	0.53	\$500.00	\$265.00
4/28/2022	JSG	Draft Documents	Draft initial disclosures	0.57	\$500.00	\$285.00
4/29/2022	JSG	Draft Documents	Draft discovery ESI order	0.85	\$500.00	\$425.00
5/2/2022	JSG	Draft Documents	Draft initial disclosures	0.15	\$500.00	\$75.00
5/2/2022	JSG	Draft Documents	Draft case management plan	0.23	\$500.00	\$115.00
5/3/2022	JSG	Draft Documents	Draft initial disclosures	1.31	\$500.00	\$655.00
5/4/2022	JSG	Draft Documents	Draft case management, discovery plan, and initial disclosures	1.45	\$500.00	\$725.00
5/5/2022	JSG	Draft Documents	Draft initial disclosures	2.22	\$500.00	\$1,110.00
5/6/2022	JSG	Review	Review settlement offer	1.36	\$500.00	\$680.00
5/9/2022	JSG	Conference with client	Conference with client and local counsel and EWT and RPS	0.83	\$500.00	\$415.00
5/10/2022	JSG	Research	Research [REDACTED]	1.61	\$500.00	\$805.00
5/12/2022	JSG	Review	Review mark up draft of revised rule 68 offer	0.24	\$500.00	\$120.00
5/12/2022	JSG	Research	Research [REDACTED]	0.50	\$500.00	\$250.00
5/12/2022	JSG	Meeting	meeting with local counsel to [REDACTED]	0.51	\$500.00	\$255.00

5/12/2022	JSG	Preparation	Preparation for and coordination of settlement conference with opposing counsel	2.77	\$500.00	\$1,385.00
5/13/2022	JSG	Meeting	Meeting with opposing counsel about Rule 16 conference and settlement	2.40	\$500.00	\$1,200.00
5/15/2022	JSG	Draft Documents	Draft settlement agreement	1.37	\$500.00	\$685.00
5/16/2022	JSG	Draft Documents	Draft settlement agreement	3.76	\$500.00	\$1,880.00
5/17/2022	JSG	Draft Documents	Draft settlement agreement	4.22	\$500.00	\$2,110.00
5/18/2022	JSG	Draft Documents	Draft settlement agreement	1.00	\$500.00	\$500.00
5/19/2022	JSG	Phone call with opposing Attorney	Coordinated extension of Rule 68 offer	0.50	\$500.00	\$250.00
Subtotal				193.27		\$96,635.00

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,

v.

CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

**DECLARATION OF
LINDSEY E. SACHER**

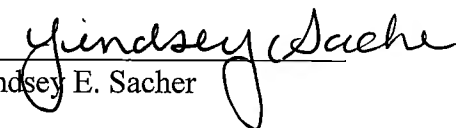
Lindsey E. Sacher declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am Counsel at Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland, Ohio 44113, attorneys for the Plaintiffs, and am duly admitted to practice law in the State of Ohio and the Commonwealth of Pennsylvania.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendants.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in the State of Ohio in 2011, and in the Commonwealth of Pennsylvania in 2019.
5. I graduated from Miami University in 2006, and Case Western Reserve University School of Law in 2011.

6. Previously, I was employed by Calfee, Halter, & Griswold LLP from October 2011 through July 2021 where I practiced in the areas of tort, insurance, and business litigation.
7. My services for Tucker Ellis LLP were billed out at \$450 per hour for this litigation.
8. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of my contemporaneous time records of legal services performed in this matter. It reflects 81.3 hours of billable attorney time spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/11/23

/s/ 
Lindsey E. Sacher

DECLARATION OF LINDSEY E. SACHER
EXHIBIT A

Timekeeper:	Lindsey E. Sacher	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (From Timeslips)
1/14/2022	LES	Federal action	Review/analysis of Joint Status Report and provide comments regarding same.	0.8	\$450.00	\$360.00
1/21/2022	LES	Federal action	Exchange correspondence with Storzer firm lawyers regarding status of settlement and proposed development agreement.	0.4	\$450.00	\$180.00
10/9/2021	LES	Federal action	Review/analysis of draft Complaint per request of D.C. counsel to identify changes necessary to conform with local rules and practice from a formatting, style and organization standpoint.	2.1	\$450.00	\$892.50
10/11/2021	LES	Federal action	Further review/analysis of draft Complaint, civil cover sheet, corporate disclosure statements, etc.; identification of suggested revisions; conferences with John Slagter and Jonathan Gross regarding same; review/analysis of local rules/practice regarding pro hac vice admission for purpose of advising and answering questions of co-counsel regarding same.	2.9	\$450.00	\$1,232.50
10/13/2021	LES	Federal action	Coordinate filing and assist in finalizing Complaint, corporate disclosure statements, summons, and civil cover sheets; exchange various correspondence with J. Gross regarding same.	1.6	\$450.00	\$680.00

10/14/2021	LES	Federal action	Review/analysis and finalization of pro hac vice papers and coordinate filing of same; exchange correspondence with J. Gross re media inquiries; advise co-counsel regarding expected next steps regarding service of summons and complaint; coordinate submission of necessary materials to clerk's office for purpose of same.	1.3	\$450.00	\$552.50
10/21/2021	LES	Federal action	Confirm status of service of process and draft correspondence to co-counsel regarding same.	0.2	\$450.00	\$85.00
10/27/2021	LES	Federal action	Exchange correspondence with co-counsel regarding upcoming hearing and mediation.	0.2	\$450.00	\$85.00
11/8/2021	LES	Federal action	Review/analysis of Motion to Dismiss filed by the City and develop strategy regarding next steps including filing of stipulation to stay both federal and state court actions; conference with co-counsel regarding same.	2	\$450.00	\$850.00
11/10/2021	LES	Federal action	Review/analysis of court orders pertaining to reassignment of case to Judge Calabrese and granting motions for pro hac vice and draft correspondence to co-counsel regarding same; review/analysis of proposed stipulation for stay of federal action and exchange correspondence re same.	0.8	\$450.00	\$340.00
11/23/2021	LES	Federal action	Preparation for and participation in pre-mediation conference.	1	\$450.00	\$425.00
11/30/2021	LES	Federal action	Review/analysis and provide comments and suggested revisions regarding mediation statement.	0.8	\$450.00	\$340.00
3/30/2022	LES	Federal action	Preparation for and participation in telephone conference with counsel regarding scheduling of litigation dates and deadlines.	1.3	\$450.00	\$585.00

4/4/2022	LES	Federal action	Conference call with J. Gross and S. Rath regarding various issues related to case, including proposed stipulation regarding lifting of stay and case schedule.	0.5	\$450.00	\$225.00
5/4/2022	LES	Federal action	Review and provide comments/ revisions to 26(F) report; assist in organizing and preparing for 26(F) conference and Rule 16.3 conference with court.	1	\$450.00	\$450.00
5/9/2022	LES	Federal action	Review/analysis of defendant's offer of judgment; update research regarding Rule 68; participate in telephone conference with case team regarding strategy for responding to same.	1.5	\$450.00	\$675.00
5/12/2022	LES	Federal action	Conference with case team regarding response to offer of judgment; propose draft revisions to offer of judgment; conference with E. Nemecek regarding impact on criminal proceedings.	1.6	\$450.00	\$720.00
5/13/2022	LES	Federal action	Draft Motion to Continue CMC; further correspondence with case team regarding same including offer of judgment.	0.8	\$450.00	\$360.00
5/17/2022	LES	Federal action	Assist in preparing, revising, and finalizing settlement agreement, including participation in conference calls with case team regarding same.	3.2	\$450.00	\$1,440.00
5/18/2022	LES	Federal action	Further review, revision, and coordination with counsel regarding settlement agreement.	1.4	\$450.00	\$630.00
5/19/2022	LES	Federal action	Draft and exchange correspondence regarding stipulation to extend time for Plaintiffs to respond to Offer of Judgment.	0.5	\$450.00	\$225.00
5/24/2022	LES	Federal action	Correspondence and conference call with co-counsel regarding extension of response to Rule 68 offer and status of settlement agreement negotiation..	0.7	\$450.00	\$315.00

6/3/2022	LES	Federal action	Conference with E. Nemecek regarding settlement and procedure for obtaining dismissal of criminal case.	0.4	\$450.00	\$180.00
6/7/2022	LES	Federal action	Review/analysis of City's revisions to Settlement Agreement; conference with co-counsel regarding same.	0.7	\$450.00	\$315.00
6/13/2022	LES	Federal action	Draft and file additional stipulation to extend deadline for offer of judgment response; exchange correspondence with counsel regarding settlement agreement.	0.5	\$450.00	\$225.00
6/15/2022	LES	Federal action	Review/revise/draft language pertaining to settlement agreement and development agreement.	2.1	\$450.00	\$945.00
6/20/2022	LES	Federal action	Conference with co-counsel regarding status of settlement and various issues raised by client in connection with property.	0.4	\$450.00	\$180.00
6/23/2022	LES	Federal action	further review/revision of settlement agreement and exhibits thereto; exchange communications with counsel regarding same.	0.9	\$450.00	\$405.00
6/28/2022	LES	Federal action	Further review of settlement agreement and questions regarding same from client; telephone conference with client team and Storzer attorneys regarding same; exchange correspondence with Eric Nemecek regarding criminal case aspects of settlement agreement.	2.5	\$450.00	\$1,125.00
7/8/2022	LES	Federal action	Draft and coordinate review, approval and filing of extensions for Rule 68 offer and CMC with court.	0.5	\$450.00	\$225.00
7/12/2022	LES	Federal action	Review/analysis of J. Calabrese standing order for CMCs and conference with co-counsel regarding same, as well as potential postponement of conference.	0.5	\$450.00	\$225.00

8/9/2022	LES	Federal action	Obtain extension of deadline for responding to offer of judgment and of CMC in state court; correspondence with DC counsel regarding same.	0.4	\$450.00	\$180.00
8/24/2022	LES	Federal action	Review/analysis of city's proposed revisions to draft settlement agreement and make recommendations regarding same.	1.4	\$450.00	\$630.00
9/2/2022	LES	Federal action	Preparation for and participation in conference with co-counsel regarding settlement agreement and additional steps to be taken to finalize same.	0.6	\$450.00	\$270.00
9/12/2022	LES	Federal action	Preparation for and participation in conference with Shneor Levine regarding settlement agreement and case status; legal research/analysis regarding [REDACTED]; draft and file joint stipulation of time to respond to Rule 68 offer.	1.8	\$450.00	\$810.00
9/13/2022	LES	Federal action	Review/analysis of revisions to settlement agreement provided by City and update draft with additional revisions.	1	\$450.00	\$450.00
9/19/2022	LES	Federal action	Further review and additional revision to settlement agreement in response to revisions provided by City; review/analysis of proposed plans for incorporation into same; communicate with co-counsel regarding same.	1	\$450.00	\$450.00
9/22/2022	LES	Federal action	Communicate with client team regarding status of settlement agreement and possible need to obtain additional extension of Rule 68 deadline.	0.7	\$450.00	\$315.00

9/28/2022	LES	Federal action	preparation for and participate in telephone conference with client team regarding settlement agreement; communicate with counsel for city regarding revisions to same; conference with E. Nemecek regarding status and strategy for dealing with municipal court case; communicate with L. McConville regarding same.	1.9	\$450.00	\$855.00
10/4/2022	LES	Federal action	Conference call with S. Speed and S. Rath regarding extension of Rule 68 offer, status of settlement and upcoming court conference.	0.7	\$450.00	\$315.00
10/5/2022	LES	Federal action	Preparation for status conference with court, including call with Mark Landes; attend status conference.	0.9	\$450.00	\$405.00
10/14/2022	LES	Federal action	Review/analysis of settlement agreement as provided by City; conference with Yehuda, Sam, and Sieglinde regarding same.	1	\$450.00	\$450.00
10/19/2022	LES	Federal action	Preparation of talking points for conversation with city regarding updates to settlement agreement.	0.8	\$450.00	\$360.00
10/21/2022	LES	Federal action	Communication with co-counsel regarding status of settlement; develop strategy for keeping movement with respect to same.	0.9	\$450.00	\$405.00
10/27/2022	LES	Federal action	Review/analysis of additional revisions to SA from City and from Co-counsel to identify any outstanding areas for discussion; create comparison document to depict outstanding issues.	2.7	\$450.00	\$1,215.00

10/31/2022	LES	Federal action	Further analysis of settlement agreement as revised by co-counsel including deletion of section regarding escrow as discussed with client; preparation of another extension of time to respond to Rule 68 offer; exchange communications with S. Speed regarding same.	1.4	\$450.00	\$630.00
11/3/2022	LES	Federal action	Further attention to settlement discussions/negotiations including conference with co-counsel regarding same; preparation for and participation in conference with court.	2.3	\$450.00	\$1,035.00
11/8/2022	LES	Federal action	Continued work on finalizing settlement; conference with co-counsel regarding proposed revisions; conference with E. Nemecek regarding provisions pertaining to municipal case; develop strategy for expediting finalization.	1.7	\$450.00	\$765.00
11/15/2022	LES	Federal action	Continued attention to revision of settlement agreement and incorporation of proposed changes made by City, as well as additional drawings provided by architect.	2.1	\$450.00	\$945.00
11/16/2022	LES	Federal action	Re-revision of settlement agreement.	2	\$450.00	\$900.00
11/21/2022	LES	Federal action	Continued review/analysis and communication with counsel regarding issues pertaining to portion of settlement agreement related to municipal case.	1.1	\$450.00	\$495.00
11/22/2022	LES	Federal action	Preparation for and participation in Case Management Conference; communications with E. Nemecek regarding issues pertaining to portion of settlement agreement regarding criminal/municipal case.	0.8	\$450.00	\$360.00

11/28/2022	LES	Federal action	Conference with co-counsel regarding settlement; conduct legal research/analysis regarding [REDACTED]	2.2	\$450.00	\$990.00
11/29/2022	LES	Federal action	Continued legal research and analysis regarding approach to section of settlement agreement pertaining to criminal/municipal matter; revise language regarding same.	2.4	\$450.00	\$1,080.00
11/30/2022	LES	Federal action	Conference with client and co-counsel regarding proposed revisions to section 6 of settlement agreement; draft correspondence to City regarding same; obtain extension of Rule 68 deadline.	1.4	\$450.00	\$630.00
12/2/2022	LES	Federal action	Attention to various issues related to settlement, including conferences with S. Speed and J. Slagter; provide update to client.	1.1	\$450.00	\$495.00
12/5/2022	LES	Federal action	Research/analysis [REDACTED]	0.7	\$450.00	\$315.00
12/06/2022	LES	Federal action	Conference with S. Speed and S. Rath regarding fee petition and authority regarding signature of agreement; update agreement draft based on discussions with city; investigate time for objectors to make formal submissions.	1.10	\$450.00	\$495.00
12/12/2022	LES	Federal action	Further update/revision of Settlement Agreement; communicate with S. Speed regarding same; communicate and coordinate with City regarding Rule 68 extension and filing of same.	1.20	\$450.00	\$540.00
12/15/2022	LES	Federal action	Analysis regarding press request for comment regarding settlement and appropriate response regarding same; continued attention to settlement agreement and steps toward approval by City Council; communicate with client and co-counsel regarding same.	1.90	\$450.00	\$855.00

12/19/2022	LES	Federal action	Coordinate gathering of fee information and preparation of declarations in support of fee application; review correspondence regarding approval by City Council of settlement.	1.10	\$450.00	\$495.00
12/20/2022	LES	Federal action	Further attention to issues related to settlement agreement finalization and execution including begin preparation of resolution from LLC allowing Rabbi Denciger to sign on its behalf.	0.90	\$450.00	\$405.00
12/23/2022	LES	Federal action	Finalize signatures/signature pages of settlement agreement and resolution of LLC authorizing signature of same; preparation and filing of Proposed Order attaching settlement agreement; exchange correspondence with co-counsel and client regarding same; analysis of Notice of settlement proposed by counsel for city to file and evaluate whether to make a joint notice; communicate further with co-counsel regarding same.	3.20	\$450.00	\$1,440.00
12/28/2022	LES	Federal action	Preparation of timeline for client of next steps pursuant to terms of settlement agreement and development agreement to be taken in order to obtain all necessary approvals and other actions to be taken to finalize all settlement related actions; communicate with S. Speed regarding same.	1.80	\$450.00	\$810.00
Subtotal				81.30		\$36,262.50

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC

Plaintiffs,
v.
CITY OF UNIVERSITY HEIGHTS,

Defendant.

Case No. 1:21-CV-01945-JPC

DECLARATION OF JOHN P. SLAGTER

John P. Slagter declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Partner at Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland, Ohio 44113, attorneys for the Plaintiffs, and am duly admitted to practice law in the State of Ohio.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendant.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in the State of Ohio in 1991.
5. I graduated from John Carroll University in 1988 and from Case Western Reserve University School of Law in 1991.
6. Previously, I was employed by Buckingham, Doolittle and Burroughs, LLC from 1996 to 2019 where I practiced land use and real estate law.

7. Although my normal billing rate is currently \$625 per hour (and was \$595 per hour for 2022), my services for Tucker Ellis LLP were billed out at \$465 per hour for this litigation.
8. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing that reflects contemporaneous time records of legal services performed in this matter. It reflects 179.6 hours of billable attorney time spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.
10. As the Partner at Tucker Ellis LLP responsible for managing this litigation, I reviewed the billing records attached to the Declarations of attorneys Lindsey Sacher, Danielle Easton, and Anthony Vacanti.
11. In consultation with those attorneys, I exercised my billing judgment to write off any time entries that may be seen as unproductive, excessive, or redundant.
12. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**.
13. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

14. As the partner responsible for managing this litigation for Tucker Ellis LLP, I directed and supervised the work and billing of Amanda Tomecko, the paralegal involved in this matter. Ms. Tomecko's services were billed at \$175 per hour.
15. Per my instruction, throughout the course of this litigation the paralegal listed above maintained contemporaneous time records of her services rendered on behalf of Plaintiffs. **Exhibit B** contains a listing of those records of work performed in this matter as well as my exercise of billing judgment to write off any time entries that may be seen as unproductive, excessive, or redundant. It reflects a total of 8.5 hours of billable paralegal time spent on this matter and Plaintiffs' application for attorney's fees.
16. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit B**. I certify the records displayed in **Exhibit B** to be accurate and true and that they were incurred with respect to providing paralegal services only for this case for the period as indicated thereon.
17. Also as the partner responsible for managing this litigation for Tucker Ellis LLP, I directed and supervised the consumption of taxable costs during this litigation. **Exhibit C** contains a listing of those records consumed in this matter.
18. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit C**. I certify the records displayed in **Exhibit C** to be accurate and true and that they were incurred with respect to providing services for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2023

/s/ John P. Slagter
John P. Slagter

**DECLARATION OF JOHN P. SLAGTER
EXHIBIT A**

Timekeeper:	John P. Slagter	Attorney					
Date	Timekeeper	Task	Description	Time	Rate	Total (From Timeslips)	
9/9/2021	JPS	Federal action	Conference with client and Co-counsel concerning status of matter and strategy for proceeding.	0.80	\$465.00	\$372.00	
9/20/2021	JPS	Federal action	Discussion with law director concerning mediation; obtain mediator recommendations.	0.80	\$465.00	\$372.00	
9/21/2021	JPS	Federal action	Follow-up with law director and outline terms of proposed mediation for client.	0.90	\$465.00	\$418.50	
9/23/2021	JPS	Federal action	Conference with client concerning mediation options and status of case; call with Court concerning status of case; follow-up with law director for City; follow-up with Co-counsel concerning questions on leasing and other Ohio based legal questions concerning Federal lawsuit.	2.80	\$465.00	\$1,302.00	
9/24/2021	JPS	Federal action	Call to Jonathan Gross concerning status of matter; call to Luke McConville request for exception to use basement occupancy in Mediation; update team on status of Mediation; discussion with Jerry Weiss regarding availability for Mediation; follow-up with Luke McConville and discussion with client.	2.00	\$465.00	\$930.00	
9/25/2021	JPS	Federal action	Follow-up concerning access to basement.	0.20	\$465.00	\$93.00	
9/26/2021	JPS	Federal action	Follow-up with Luke McConville; discussion with client; conference with co-counsel; discuss strategy for proceeding forward; review terms of Mediation with co-counsel; conference with co-counsel and client.	1.60	\$465.00	\$744.00	

9/27/2021	JPS	Federal action	Participate in conference call with Judge concerning Mediation; follow-up with client; follow-up with Co-counsel concerning claims and Mediation; follow-up with client concerning call from press; discussion with Co-counsel concerning Federal claims and disclosures.	1.70	\$465.00	\$790.50	
9/28/2021	JPS	Federal action	Review background of Attorney Unger; review notices from Court.	0.20	\$465.00	\$93.00	
9/29/2021	JPS	Federal action	Conference with Luke McConville concerning mediation, occupancy limit and Federal lawsuit.	0.80	\$465.00	\$372.00	
9/30/2021	JPS	Federal action	Follow-up with Mediator on availability; follow-up with City concerning availability and alternate dates.	0.60	\$465.00	\$279.00	
10/1/2021	JPS	Federal action	Follow-up with Mike Unger, potential mediator.	0.40	\$465.00	\$186.00	
10/4/2021	JPS	Federal action	Review Complaint; call with Luke McConville concerning filing of Federal Complaint and scheduling Mediation.	1.10	\$465.00	\$511.50	
10/5/2021	JPS	Federal action	Follow-up on Mediation and Complaint.	1.30	\$465.00	\$604.50	
10/6/2021	JPS	Federal action	Review Complaint; conference call with co-counsel and follow-up on Mediation.	2.70	\$465.00	\$1,255.50	
10/7/2021	JPS	Federal action	Finalize Complaint; forward to client; call with client concerning filing of Federal Complaint and objections thereto; call with Law Director concerning Mediation.	2.70	\$465.00	\$1,255.50	
10/8/2021	JPS	Federal action	Review Complaint and follow-up on Mediation; conference with Co-counsel; communicate with client concerning filing of Federal lawsuit and press release issues.	2.50	\$465.00	\$1,162.50	
10/11/2021	JPS	Federal action	Review final Complaint for Federal Court; discussion with Lindsey Sacher; discuss with Luke McConville regarding imminent filing of Complaint; follow-up with Co-counsel.	2.30	\$465.00	\$1,069.50	

10/13/2021	JPS	Federal action	Finalize and review Complaint; review disclosure pro hac vice motion; review press release; discussion with Jonathan Gross; follow-up with Co-counsel concerning revisions and finalization; forward courtesy copy of Complaint to Luke McConville.	1.60	\$465.00	\$744.00	
10/14/2021	JPS	Federal action	Review questions from reporters and communication from Co-counsel; follow-up with Co-counsel concerning such.	0.30	\$465.00	\$139.50	
10/20/2021	JPS	Federal action	Follow-up on scheduling of mediation; discussion with Luke McConville.	0.40	\$465.00	\$186.00	
10/21/2021	JPS	Federal action	Conference call with Co-counsel regarding strategy for proceeding, including proceeding with special use permit, Mediation, and rescheduling of hearing.	0.80	\$465.00	\$372.00	
10/22/2021	JPS	Federal action	Follow-up concerning client inquiry on update; review status update from Co-counsel.	0.60	\$465.00	\$279.00	
10/29/2021	JPS	Federal action	Follow-up on Mediation scheduling.	0.70	\$465.00	\$325.50	
11/2/2021	JPS	Federal action	Follow-up concerning Mediation and discuss and direct architect moving forward with plan.	1.70	\$465.00	\$790.50	
11/3/2021	JPS	Federal action	Review documents forwarded by architect.	1.00	\$465.00	\$465.00	
11/8/2021	JPS	Federal action	Review Motion to Dismiss filed in Federal Court; review proposed order from City and revisions thereto; review and research [REDACTED]; conference call with Storzer Firm concerning Motion to Dismiss and revisions to proposed order; schedule meeting with client and architect.	2.90	\$465.00	\$1,348.50	
11/10/2021	JPS	Federal action	Review docket in Federal Court.	0.40	\$465.00	\$186.00	
11/11/2021	JPS	Federal action	Follow-up on status of Federal Court proposed Order; discuss with Luke McConville Mediation and State and Federal Order.	1.10	\$465.00	\$511.50	

11/12/2021	JPS	Federal action	Follow-up with Mediator and confirm Mediation Conference and attendance at such; confirm with Co-counsel availability; finalize Federal Court Order staying matter; review architect's communication on correction of violations and outstanding violations with City of University Heights.	2.30	\$465.00	\$1,069.50	
11/15/2021	JPS	Federal action	Review documents from architect; follow-up with counsel for City concerning status of proposed Orders; review changes to Order; follow-up with Co-counsel.	1.20	\$465.00	\$558.00	
11/23/2021	JPS	Federal action	Conference with Mediator and follow-up with Co-counsel concerning Mediator's disclosures.	1.00	\$465.00	\$465.00	
11/29/2021	JPS	Federal action	Discussion with Jonathan Gross; review changes to Proposed Order; forward to Attorney McConville; follow-up and discussion with Attorney Cicero concerning Mediation and outstanding issues; discussion with client concerning Mediation, Settlement and Hearing; review Section 1274 concerning hearing requirements.	1.80	\$465.00	\$837.00	
11/30/2021	JPS	Federal action	Review and revise Mediation Statement; review Lindsey Sacher's changes to Mediation Statement; discussion with Jonathan Gross; follow-up and strategize on damages.	2.80	\$465.00	\$1,302.00	
12/3/2021	JPS	Federal action	Travel to and attend Mediation.	8.50	\$465.00	\$3,952.50	
12/8/2021	JPS	Federal action	Confirm and follow-up on post-mediation issues.	0.60	\$465.00	\$279.00	
12/9/2021	JPS	Federal action	Review agreed order with Co-counsel and Law Director; follow-up call with client concerning such.	1.00	\$465.00	\$465.00	
12/10/2021	JPS	Federal action	Call with Mediator concerning Mediation Statement, status of Mediation, and scheduling; follow-up call with client and co-counsel.	0.80	\$465.00	\$372.00	
12/13/2021	JPS	Federal action	Follow-up with Co-counsel.	0.40	\$465.00	\$186.00	

12/15/2021	JPS	Federal action	Review communication from Mediator concerning proceeding with Mediation Statements; follow-up with Co-counsel concerning such; review Memorandum from architect.	0.90	\$465.00	\$418.50	
12/16/2021	JPS	Federal action	Review revisions to proposed order; review Memorandum and documents from architect; follow-up with Jonathan Gross on status of matter.	1.40	\$465.00	\$651.00	
12/20/2021	JPS	Federal action	Follow-up concerning timing of mediation statements; request and obtain Planning Commission meeting transcript.	0.30	\$465.00	\$139.50	
12/28/2021	JPS	Federal action	Conference call with Jonathan Gross; discuss status of proposed order and mediation statement; review draft mediation statement and revise; review proposed order from City concerning injunction modifications by City; forward to Jonathan Gross.	1.70	\$465.00	\$790.50	
12/29/2021	JPS	Federal action	Call with Luke McConville concerning arbitration brief; review injunction order; review proposed mediation brief and statement; modify and forward changes to such to Jonathan Gross.	2.00	\$465.00	\$930.00	
12/29/2021	JPS	Federal action	Follow-up on injunction question from client and with law director concerning proposed order.	0.30	\$465.00	\$139.50	
1/11/2022	JPS	Federal action	Follow-up with Mediator on status of Mediation and rescheduling of such; review memorandum or architect.	1.00	\$465.00	\$465.00	
1/13/2022	JPS	Federal action	Review draft status report to Federal Court from co-counsel; review Memorandum from architect.	1.20	\$465.00	\$558.00	
1/14/2022	JPS	Federal action	Follow-up on Mediation; follow-up with co-counsel on status of matter; review status report from criminal counsel; review status report for Federal Court and authorize filing of such.	1.40	\$465.00	\$651.00	
1/17/2022	JPS	Federal action	Review update from criminal case.	0.20	\$465.00	\$93.00	

1/21/2022	JPS	Federal action	Follow-up and confirm Mediation review plan from architect.	0.50	\$465.00	\$232.50	
1/25/2022	JPS	Federal action	Follow-up concerning status of Mediation, Development Agreement, and proposal of Mediator.	0.50	\$465.00	\$232.50	
1/26/2022	JPS	Federal action	Follow-up on Mediation.	0.40	\$465.00	\$186.00	
2/1/2022	JPS	Federal action	Follow-up on status of development agreement with City and on proposed order.	0.40	\$465.00	\$186.00	
2/7/2022	JPS	Federal action	Call with Mediator.	0.40	\$465.00	\$186.00	
2/8/2022	JPS	Federal action	Update client on status of matter in discussion with Mediator.	0.20	\$465.00	\$93.00	
2/10/2022	JPS	Federal action	Strategy call with Co-counsel concerning proposed changes to Shul; follow-up concerning such; finalize proposed order and discuss property taxation issue with client.	2.00	\$465.00	\$930.00	
2/14/2022	JPS	Federal action	Conference call with Arbitrator; approve of Joint Status Report.	0.80	\$465.00	\$372.00	
2/15/2022	JPS	Federal action	Review development agreement and forward to co-counsel.	0.70	\$465.00	\$325.50	
2/16/2022	JPS	Federal action	Review documents and proposed plans; travel to and attend site review.	1.80	\$465.00	\$837.00	
2/17/2022	JPS	Federal action	Review revised Order and forward to Co-counsel.	0.50	\$465.00	\$232.50	
2/21/2022	JPS	Federal action	Follow-up with co-counsel concerning Mediation and necessity for such.	0.40	\$465.00	\$186.00	
2/24/2022	JPS	Federal action	Review updated plan; send communication to council for City concerning cancellation of Mediation; follow-up on Mediation.	1.40	\$465.00	\$651.00	
3/2/2022	JPS	Federal action	Follow-up on Mediator's proposal; review Mediator's proposal.	0.60	\$465.00	\$279.00	
3/3/2022	JPS	Federal action	Conference with client concerning review of Mediator's proposal and strategy relating to such.	0.90	\$465.00	\$418.50	
3/7/2022	JPS	Federal action	Follow-up on extension of Mediator's Report; follow-up with client and Jonathan Gross concerning such.	0.80	\$465.00	\$372.00	

3/14/2022	JPS	Federal action	Discussion with Luke McConville concerning settlement demand; call with client and co-counsel; obtain authorization from client to reject Mediator's proposal; draft and submit demand and response to Mediator's proposal to Mediator; review draft plans and emails.	3.20	\$465.00	\$1,488.00	
3/15/2022	JPS	Federal action	Review communication from Mediator on failure to obtain agreement on Mediator's proposal; conference with co-counsel; call to Luke McConville concerning proceeding forward and potential settlement.	0.80	\$465.00	\$372.00	
3/17/2022	JPS	Federal action	Update client on discussion with City Law Director.	0.20	\$465.00	\$93.00	
3/21/2022	JPS	Federal action	Follow-up with client concerning Mediator's proposal and architectural review board attendance by architect.	0.20	\$465.00	\$93.00	
3/23/2022	JPS	Federal action	Call with client on Mediator proposal and next steps; review documents including revised plans.	0.90	\$465.00	\$418.50	
3/24/2022	JPS	Federal action	Call with co-counsel concerning timing of case and scheduling of dates, discovery and otherwise; discuss development agreement and communication with City regarding strategy concerning such; review development agreement.	0.90	\$465.00	\$418.50	
3/25/2022	JPS	Federal action	Review development agreement; follow-up with Danielle Easton concerning such; review email of Brief from Eric Nemecek; follow-up with Luke McConville and Jonathan Gross on scheduling call.	0.70	\$465.00	\$325.50	
3/28/2022	JPS	Federal action	Review development agreement; discuss revising such with Danielle Easton and Amanda Tomecko.	0.30	\$465.00	\$139.50	
3/29/2022	JPS	Federal action	Follow-up with co-counsel on case deadlines.	0.20	\$465.00	\$93.00	
4/18/2022	JPS	Federal action	Review Answer to Complaint in federal case.	0.60	\$465.00	\$279.00	

4/25/2022	JPS	Federal action	Follow-up on status of matter and prepare for upcoming Case Management Conference; communicate with Co-counsel.	0.50	\$465.00	\$120.00	
4/26/2022	JPS	Federal action	Call with client concerning status of settlement; call with Court on Case Management Conference; follow-up with Luke McConville concerning settlement and development agreement; follow-up and update client.	1.40	\$465.00	\$651.00	
4/28/2022	JPS	Federal action	Review next steps concerning site plan; follow-up with architect.	0.20	\$465.00	\$93.00	
4/29/2022	JPS	Federal action	Review revised plan; send to Luke McConville; follow-up with architect.	0.70	\$465.00	\$325.50	
5/4/2022	JPS	Federal action	Review and follow-up with client on draft Case Management Conference plan.	0.80	\$465.00	\$372.00	
5/5/2022	JPS	Federal action	Review draft and revisions to Rule 26F report.	0.30	\$465.00	\$139.50	
5/9/2022	JPS	Federal action	Follow-up on Case Management Conference and status of settlement.	0.70	\$465.00	\$325.50	
5/10/2022	JPS	Federal action	Follow-up with City on settlement and proposed offer and potential modifications thereto; update client concerning such.	0.80	\$465.00	\$372.00	
5/12/2022	JPS	Federal action	Follow-up on status of settlement offer; review revisions to offer of settlement; discuss with co-counsel.	1.60	\$465.00	\$744.00	
5/13/2022	JPS	Federal action	Review communication from criminal attorney concerning settlement; discuss offer of settlement status; reschedule of Case Management Conference; review Motion concerning such; conference call with counsel.	1.70	\$465.00	\$790.50	
5/16/2022	JPS	Federal action	Draft and revise Settlement Agreement; follow-up with co-counsel.	2.00	\$465.00	\$930.00	
5/17/2022	JPS	Federal action	Participate in update strategy call; review and revise Settlement Agreement.	1.60	\$465.00	\$744.00	
5/18/2022	JPS	Federal action	Review revisions to settlement; follow-up concerning such; confirm forwarding to City.	1.30	\$465.00	\$604.50	

5/24/2022	JPS	Federal action	Discussion with Luke McConville concerning timing of response on settlement and update co-counsel.	0.60	\$465.00	\$279.00	
5/27/2022	JPS	Federal action	Follow-up with law director; review deadlines; follow-up concerning client's inquiry about approval of settlement by criminal counsel.	0.60	\$465.00	\$279.00	
5/31/2022	JPS	Federal action	Follow-up concerning Notice required by Court and expected time for receiving settlement; discussion with Luke McConville and Lindsey Sacher on status.	0.70	\$465.00	\$325.50	
6/1/2022	JPS	Federal action	Follow-up with Luke McConville concerning extension of offer of settlement and obtain consent for rescheduling Case Management Conference; reply to Co-counsel concerning such.	0.90	\$465.00	\$418.50	
6/2/2022	JPS	Federal action	Confirm extension; update client concerning such.	0.30	\$465.00	\$139.50	
6/6/2022	JPS	Federal action	Follow-up with Luke McConville on status of settlement; obtain cancellation of status conference; discussion concerning proposal; review redline proposal and follow-up.	2.30	\$465.00	\$1,069.50	
6/7/2022	JPS	Federal action	Conference with client concerning proposed settlement; review proposed settlement; participate in strategy call; follow-up concerning such.	1.40	\$465.00	\$651.00	
6/8/2022	JPS	Federal action	Group call and strategy call with client and follow-up on settlement.	1.80	\$465.00	\$837.00	
6/10/2022	JPS	Federal action	Follow-up with Luke McConville concerning settlement; request for extension and discuss with co-counsel status of matter.	1.20	\$465.00	\$558.00	
6/13/2022	JPS	Federal action	Follow-up with architect concerning status of drawing necessary for settlement and steps for proceeding for approval; follow-up and confirm from Luke McConville consent to extend deadlines.	1.30	\$465.00	\$604.50	

6/17/2022	JPS	Federal action	Revise and update development agreement; forward to co-counsel; follow-up with co-counsel; follow-up with City concerning performance bond.	1.40	\$465.00	\$651.00	
6/20/2022	JPS	Federal action	Review development agreement and proposed settlement; call concerning such.	1.70	\$465.00	\$790.50	
6/21/2022	JPS	Federal action	Update call with client; follow-up concerning settlement.	0.80	\$465.00	\$372.00	
6/23/2022	JPS	Federal action	Review comments on settlement agreement and development agreement; participate in conference call concerning such.	0.80	\$465.00	\$372.00	
6/24/2022	JPS	Federal action	Review revised settlement agreement; follow-up on development agreement questions and issues.	1.30	\$465.00	\$604.50	
6/27/2022	JPS	Federal action	Obtain extension from Luke McConville concerning Rule 68 settlement and Case Management Conferences; follow-up on settlement issues.	1.90	\$465.00	\$883.50	
6/28/2022	JPS	Federal action	Follow-up concerning settlement language relating to criminal and development agreement; modify provisions; discussion with Luke McConville; conference call with clients and discuss finalization with Lindsay Sacher.	3.30	\$465.00	\$1,534.50	
7/6/2022	JPS	Federal action	Follow-up on settlement extension with City; update client.	0.60	\$465.00	\$279.00	
7/7/2022	JPS	Federal action	Follow-up with Luke McConville on settlement; communicate with co-counsel concerning extension; discuss with Lindsey Sacher; follow-up with Sally Levine concerning revised plan and timing of such, and outstanding issues.	1.70	\$465.00	\$790.50	
7/8/2022	JPS	Federal action	Follow-up on extension of Rule 68 and rescheduling of Case Status Conference; review and approve extensions to be filed.	0.80	\$465.00	\$372.00	

7/18/2022	JPS	Federal action	Review communication concerning development of a mikvah at ` Shul and issues relating to such, including issues with architect; follow-up concerning such.	0.80	\$465.00	\$372.00	
7/19/2022	JPS	Federal action	Conference call with co-counsel concerning case management conference and status of settlement.	0.60	\$465.00	\$279.00	
7/20/2022	JPS	Federal action	Follow-up with co-counsel concerning the status of matter; preparation of case status conference; follow-up with Luke McConville; review docket in preparation for Case Management Conference; follow-up concerning use of garage at Shul.	1.00	\$465.00	\$465.00	
7/21/2022	JPS	Federal action	Prepare for and participate in case status conference with Judge; follow-up concerning such; review Order from Court and notes of such.	0.80	\$465.00	\$372.00	
7/25/2022	JPS	Federal action	Follow-up on extension Rule 68; discussion with co-counsel; follow-up with counsel for City.	0.90	\$465.00	\$418.50	
8/8/2022	JPS	Federal action	Update on status of settlement; follow-up with City and follow-up with Lindsey Sacher concerning such.	0.30	\$465.00	\$139.50	
8/9/2022	JPS	Federal action	Call with Luke McConville; obtain Rule 68 extension; follow-up with Lindsey Sacher concerning filing of such.	0.60	\$465.00	\$279.00	
8/17/2022	JPS	Federal action	Follow-up on drawings and status of settlement.	1.00	\$465.00	\$465.00	
8/18/2022	JPS	Federal action	Follow-up with Luke McConville concerning settlement; review settlement agreement received; forward to co-counsel.	0.80	\$465.00	\$372.00	
8/19/2022	JPS	Federal action	Follow-up with Luke McConville concerning status of settlement agreement and specifically whether the version forwarded was intended to be distributed; update co-counsel.	0.70	\$465.00	\$325.50	
8/22/2022	JPS	Federal action	Review comparison on settlement agreement provided by co-counsel.	0.70	\$465.00	\$325.50	

8/24/2022	JPS	Federal action	Discuss analysis of changes with Lindsey Sacher and review comparison notes from Lindsey Sacher.	0.80	\$465.00	\$372.00	
8/31/2022	JPS	Federal action	Follow-up concerning settlement; call with client to discuss outstanding issues and review outline of issues.	0.80	\$465.00	\$372.00	
9/2/2022	JPS	Federal action	Conference call with co-counsel concerning Rule 68 issues; review settlement agreement; review communication from client.	1.00	\$465.00	\$465.00	
9/6/2022	JPS	Federal action	Schedule call concerning settlement; call with Luke McConville; call with client concerning options on settlement and strategy for proceeding forward.	1.60	\$465.00	\$744.00	
9/8/2022	JPS	Federal action	Discussion of plan submitted by client; request elevations; review new litigation and impact on existing settlement.	0.80	\$465.00	\$372.00	
9/9/2022	JPS	Federal action	Review revised plans; follow-up with Attorney Sacher concerning review of settlement; finalize and respond back to City.	0.30	\$465.00	\$139.50	
9/14/2022	JPS	Federal action	Follow-up with Luke McConville on status of settlement; follow-up with counsel concerning such.	0.60	\$465.00	\$279.00	
9/15/2022	JPS	Federal action	Review updated elevation; review new litigation filed and inform client.	0.60	\$465.00	\$279.00	
9/19/2022	JPS	Federal action	Review Settlement Agreement; discussion with Lindsey Sacher concerning such.	0.90	\$465.00	\$418.50	
9/20/2022	JPS	Federal action	Prepare for Case Management Conference and update to Court; follow-up concerning settlement; call Luke McConville and preparation for call; participate in call with Court.	1.30	\$465.00	\$604.50	
9/21/2022	JPS	Federal action	Update on settlement; review Court order and confirm reschedule of dates.	1.00	\$465.00	\$465.00	
9/22/2022	JPS	Federal action	Review revised elevations; follow-up with client concerning such and follow-up on settlement issues.	0.70	\$465.00	\$325.50	

9/23/2022	JPS	Federal action	Review emails on settlement and criminal fines; review research on criminal fines.	0.80	\$465.00	\$372.00	
9/26/2022	JPS	Federal action	Follow-up on status of settlement and outstanding issues with co-counsel.	0.60	\$465.00	\$279.00	
9/28/2022	JPS	Federal action	Review revisions and communication from co-counsel and to counsel for City.	0.80	\$465.00	\$372.00	
9/30/2022	JPS	Federal action	Discussion with Luke McConville concerning status of matter, Rule 68 in Municipal case; follow-up with Lindsey Sacher concerning such.	0.60	\$465.00	\$279.00	
10/5/2022	JPS	Federal action	Follow-up on settlement and case status.	0.60	\$465.00	\$279.00	
10/14/2022	JPS	Federal action	Follow-up on settlement.	0.60	\$465.00	\$279.00	
10/19/2022	JPS	Federal action	Prepare for and participate in conference call with client; follow-up on settlement terms; review City's revisions.	1.30	\$465.00	\$604.50	
10/24/2022	JPS	Federal action	Review outline of issues; discuss with Luke McConville; follow-up with Luke McConville concerning outstanding settlement items; follow-up with Co-counsel concerning response to such.	1.20	\$465.00	\$558.00	
10/27/2022	JPS	Federal action	Review co-counsel's revisions to Settlement Agreement, including liquidated damage issue.	0.60	\$465.00	\$279.00	
10/28/2022	JPS	Federal action	Follow-up with Lindsey Sacher concerning status of settlement; request additional information; follow-up with co-counsel; review proposed dismissal modification by co-counsel.	0.50	\$465.00	\$232.50	
10/31/2022	JPS	Federal action	Follow-up with Lindsey Sacher concerning status of settlement; review redline of changes made by co-counsel.	0.60	\$465.00	\$279.00	
11/1/2022	JPS	Federal action	Follow-up on settlement.	0.40	\$465.00	\$186.00	
11/3/2022	JPS	Federal action	Review PDF; follow-up on redline document; review settlement and discuss Case Management Conference.	0.60	\$465.00	\$279.00	

11/4/2022	JPS	Federal action	Prepare for and participate in strategy call with Co-counsel concerning response from City; follow-up concerning such.	1.60	\$465.00	\$744.00	
11/7/2022	JPS	Federal action	Call with Luke McConville concerning settlement; review settlement from Luke McConville; forward to Co-counsel.	0.80	\$465.00	\$372.00	
11/8/2022	JPS	Federal action	Review settlement; identify concerns concerning mootness; follow-up concerning such.	1.30	\$465.00	\$604.50	
11/9/2022	JPS	Federal action	Follow-up with Law Director on issue relating to criminal sanctions; discuss possibility of escrowing funds and mootness issue; follow-up with Co-counsel concerning such issues.	1.90	\$465.00	\$883.50	
11/10/2022	JPS	Federal action	Review revised plan and outstanding items; obtain consent from client to forward such to City; forward to City.	0.50	\$465.00	\$232.50	
11/15/2022	JPS	Federal action	Follow-up concerning consent to obtain additional Rule 68 extension and filing of such.	0.30	\$465.00	\$139.50	
11/16/2022	JPS	Federal action	Follow-up on settlement and authorize forwarding to counsel for City.	0.60	\$465.00	\$279.00	
11/21/2022	JPS	Federal action	Call with Luke McConville; discussion with Lindsay Sacher concerning settlement in Municipal Court issue.	1.80	\$465.00	\$837.00	
11/22/2022	JPS	Federal action	Follow-up with Lindsay Sacher on status of matter; conference with Luke McConville regarding settlement.	0.80	\$465.00	\$372.00	
11/25/2022	JPS	Federal action	Follow-up with client concerning finalization of settlement and outstanding issues.	0.30	\$465.00	\$139.50	
11/28/2022	JPS	Federal action	Follow-up on settlement and criminal provision; review draft of provision.	0.80	\$465.00	\$372.00	
11/29/2022	JPS	Federal action	Review criminal provision of Settlement Agreement; follow-up with criminal attorneys concerning attempt to provide accord and satisfaction and finalization of criminal fine; review research concerning [REDACTED]; modify provisions of settlement accordingly.	2.30	\$465.00	\$1,069.50	

11/30/2022	JPS	Federal action	Call with Luke McConville; explain modifications to Settlement Agreement; follow-up on extension of Rule 68 offer.	0.80	\$465.00	\$372.00	
12/2/2022	JPS	Federal action	Update client; call with Luke McConville concerning language in settlement agreement; discuss revised revision.	1.10	\$465.00	\$511.50	
12/5/2022	JPS	Federal action	Follow-up concerning meeting dates with City and timing of settlement inquiry by Co-counsel.	0.30	\$465.00	\$139.50	
12/6/2022	JPS	Federal action	Follow-up concerning settlement status; follow-up with Luke McConville regarding settlement and timing for approval.	0.30	\$465.00	\$139.50	
12/8/2022	JPS	Federal action	Call with client concerning alternate location for prayer; call with Luke McConville; follow-up on Settlement Agreement.	1.40	\$465.00	\$651.00	
12/9/2022	JPS	Federal action	Call Luke McConville to confirm settlement.	0.90	\$465.00	\$418.50	
12/15/2022	JPS	Federal action	Follow-up with client on revisions to settlement; follow-up with Luke McConville concerning two revisions to settlement on development agreement and timing issues.	1.60	\$465.00	\$744.00	
12/19/2022	JPS	Federal action	Follow-up on settlement and revisions to criminal portion; finalize settlement agreement for Council Meeting; confirm approval by Council.	1.60	\$465.00	\$744.00	
12/20/2022	JPS	Federal action	Follow-up on next steps after approval of settlement by City.	0.60	\$465.00	\$279.00	
12/22/2022	JPS	Federal action	Follow-up on settlement and execution and timing of settlement.	0.60	\$465.00	\$279.00	

			Discuss with Luke McConville status of execution; follow-up with client on execution of settlement; review Secretary of State website for authority for execution on behalf of University Realty USA; review Articles of Organization of University Realty USA; review Resolution of Authority; discuss with client; follow-up with client on status of execution of documents; follow-up with client on objections raised to settlement, including authority issues; call with Lindsey Sacher; follow-up on execution, authority issues, and review Joint Notice drafted by counsel for City; discuss with client and co-counsel.				
12/23/2022	JPS	Federal action		2.60	\$465.00	\$1,209.00	
Subtotal:				179.60		\$83,401.50	

DECLARATION OF JOHN P. SLAGTER
EXHIBIT B

Timekeeper:	Amanda Tomecko	Paralegal				
Date	Timekeeper	Task	Description	Time	Rate	Total (From Timeslips)
11/2/2021	AT	Federal action	Reviewed status of case/email update from Sally Levine.	0.20	\$175.00	\$35.00
11/9/2021	AT	Federal action	Reviewed all relative case documents from Jonathan Gross.	0.30	\$175.00	\$52.50
11/15/2021	AT	Federal action	Meeting with John Slagter to discuss status of case/outline of presentation. Reviewed case details and began drafting outline of presentation.	3.50	\$175.00	\$612.50
12/15/2021	AT	Federal action	Mailed case files to Michael Unger of Ulmer & Berne LLP.	0.10	\$175.00	\$17.50
03/28/2022	AT	Federal action	Meeting with Mr. Slagter and Ms. Easton to discuss status of Development Agreement.	0.30	\$175.00	\$52.50
04/20/2022	AT	Federal action	Discussed status of case with Mr. Slagter.	0.10	\$175.00	\$17.50
04/25/2022	AT	Federal action	Discussed status of case with Mr. Slagter. Pulled Report of Parties' Planning Meeting Template from docket to review for any specific requirements.	0.70	\$175.00	\$122.50
05/18/2022	AT	Federal action	Discussed status of CMC rescheduling with Attorney Slagter and Attorney Sacher. Confirmed new date of CMC that is set for June 10, 2022.	0.20	\$175.00	\$35.00
05/31/2022	AT	Federal action	Discussed Offer of Judgment with Attorney Sacher and Attorney Slagter. Drafted Joint Stipulation to Extend Response regarding Offer of Judgment.	0.70	\$175.00	\$122.50
06/01/2022	AT	Federal action	Drafted Second Stipulation to Extend Response for Offer of Judgment and filed with Court. Emailed copies to all counsel. Discussed status of case with Attorney Slagter.	1.50	\$175.00	\$262.50

11/30/2022	AT	Federal action	Telephone conference with Attorney Slagter, Attorney Sacher, and Yehuda to discuss status of case and attorney fee application.	0.20	\$175.00	\$35.00
12/07/2022	AT	Federal action	Attention to organization of bills relevant for Attorney Fee Application. Email correspondence and video conference with Mr. Mesi to discuss the same.	0.50	\$175.00	\$87.50
12/15/2022	AT	Federal action	Discuss status of bill list/attorney fee application with Attorney Slagter and Attorney Sacher.	0.20	\$175.00	\$35.00
Subtotal				8.50		\$1,487.50

**DECLARATION OF JOHN P. SLAGTER
EXHIBIT C**

Work Date	Description	Sum of Worked Amount	Sum of Bill Amount
10/20/2021	Third Party Cost Filing Fees - Lindsey E. Sacher Ohio Northern District Filing Fee of New Complaint.	\$402.00	\$402.00
10/20/2021	Third Party Cost Filing Fees - Lindsey E. Sacher Ohio Northern District Filing Fee of Pro Hac Vice admission Jonathan Gross.	\$120.00	\$120.00
10/20/2021	Third Party Cost Filing Fees - Lindsey E. Sacher Ohio Northern District Filing Fee of Pro Hac Vice admission of Eric Treene.	\$120.00	\$120.00
10/20/2021	Third Party Cost Filing Fees - Lindsey E. Sacher Ohio Northern District Filing Fee of Pro HAC Vice admission Roman Storzer.	\$120.00	\$120.00
7/11/2022	Third Party Cost - United States District Court - 6/16/22, Ohio Northern District Court - Fee for filing Samuel Speed Motion for Pro Hac Admission	\$120.00	\$120.00
	Total:	\$882.00	\$882.00

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC,
Plaintiffs,
v.
CITY OF UNIVERSITY HEIGHTS,
Defendant.

Case No. 1:21-CV-01945-JPC

**DECLARATION OF
ANTHONY VACANTI**

ANTHONY VACANTI declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am Partner at Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland, Ohio 44113, attorneys for the Plaintiffs, and am duly admitted to practice law in the State of Ohio.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendants.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in the State of Ohio in 2006.
5. I graduated from The American University in 2002, and Case Western Reserve University School of Law in 2006.
6. Previously, I was employed Buckingham, Doolittle & Burroughs, LLC (2004-2019) where I practiced in the areas of land use, zoning, eminent domain, real property tax, and real estate.

7. My services for Tucker Ellis LLP were billed out at \$460 per hour for this litigation.
8. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing reflecting my contemporaneous time records of legal services performed in this matter. It reflects 5.2 hours of billable attorney time spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2023

/s/ Anthony R. Vacanti
Anthony Vacanti

**DECLARATION OF ANTHONY R. VACANTI
EXHIBIT A**

Timekeeper:	Anthony R. Vacanti	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (From Timeslips)
8/31/2021	ARV	Federal action	Conferences with Attorney Slagter; review claims against City and analyze same. Research property records. Attention to RLUIPA claim and analyze same.	1.50	\$460.00	\$690.00
9/1/2021	ARV	Federal action	Conference with Attorney Slagter concerning TRO and RLUIPA issues.	0.50	\$460.00	\$230.00
9/14/2021	ARV	Federal action	Attention to finalizing claim and filing same. Conferences with Attorney Slagter.	0.50	\$460.00	\$230.00
10/11/2021	ARV	Federal action	Conference with Attorney Slagter concerning federal claims and review of complaint.	1.00	\$460.00	\$460.00
11/08/2021	ARV	Federal action	Receipt and review of motion to dismiss or stay; conference with Attorney Slagter concerning same. Attention to obtaining Judge Gwin decisions on zoning matters.	1.20	\$460.00	\$552.00
12/6/2021	ARV	Federal action	Conference with Attorney Slagter concerning federal claims and attorneys fees.	0.50	\$460.00	\$230.00
Subtotal				5.20		\$2,392.00

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

ALEKSANDER SHUL,
SHNIOR ZALMAN DENCIGER,
AND
UNIVERSITY REALTY USA LLC,
Plaintiffs,
v.
CITY OF UNIVERSITY HEIGHTS,
Defendant.

Case No. 1:21-CV-01945-JPC

**DECLARATION OF
DANIELLE EASTON**

Danielle Easton declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an Associate at Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland, Ohio 44113, attorneys for the Plaintiffs, and am duly admitted to practice law in the State of Ohio.
2. I make this Declaration in support of the application of Plaintiffs to recover legal fees and costs against Defendants.
3. This Declaration is based on my own personal knowledge.
4. I was admitted to practice law in the State of Ohio in 2020.
5. I graduated from Ohio University in 2017, and Cleveland State University College of Law in 2020.
6. Previously, I was employed by Mansour Gavin LPA from 2020 through 2021 where I practiced in the area of business litigation.

7. My services for Tucker Ellis LLP were billed out at \$260 per hour for this litigation.
8. Throughout the course of this litigation, I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of my contemporaneous time records of legal services performed in this matter. It reflects 9.8 hours of billable attorney time spent on this matter.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in **Exhibit A** to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/10/2023

/s/ 
Danielle Easton

DECLARATION OF DANIELLE M. EASTON
EXHIBIT A

Timekeeper:	Danielle M. Easton	Attorney				
Date	Timekeeper	Task	Description	Time	Rate	Total (From Timeslips)
11/24/2021	DME	Federal action	research to determine [REDACTED]; analyze city codified ordinances	0.90	\$260.00	\$234.00
11/29/2021	DME	Federal action	research [REDACTED]; draft memorandum on the same; research case law regarding [REDACTED]; analyze case law on the same; edit and revise memorandum gather case law, statutes, and sources; evaluate university heights city council meeting minutes for [REDACTED]	5.80	\$260.00	\$1,508.00
12/13/2021	DME	Federal action	discuss status update, strategy, and upcoming tasks with Attorney Slagter and Attorney Vacanti	0.10	\$260.00	\$26.00
03/28/2022	DME	Federal action	discuss assignment of reviewing draft development agreement with JPS	0.20	\$260.00	\$60.00
04/14/2022	DME	Federal action	Status update regarding assignment	0.10	\$260.00	\$30.00
04/22/2022	DME	Federal action	Fact investigation; gather meeting documents; review development agreement.	1.50	\$260.00	450.00
04/28/2022	DME	Federal action	Draft memo regarding development agreement.	0.40	\$260.00	\$120.00
04/29/2022	DME	Federal action	Weekly status update on case.	0.10	\$260.00	\$30.00
05/18/2022	DME	Federal action	weekly status update discussion with Attorney Slagter and Ms. Tomecko	0.10	\$260.00	\$30.00
06/22/2022	DME	Federal action	discuss status update with Attorney Slagter regarding conditions of permit and development agreement	0.20	\$260.00	\$60.00
06/24/2022	DME	Federal action	status update discussion with Attorney Slagter regarding development agreement	0.10	\$260.00	\$30.00
07/26/2022	DME	Federal action	status update; create summary of case and important deadlines	0.10	\$260.00	\$30.00

08/11/2022	DME	Federal action	status update discussion with Attorney Slagter;	0.10	\$260.00	\$30.00
11/21/2022	DME	Federal action	Check case status; update matter spreadsheet.	0.10	\$260.00	\$30.00
Subtotal				9.80		\$2,668.00